



CHEMICAL COMPOUNDS, INC.

Riverside Industrial Park

29-75 Riverside Avenue • Newark, New Jersey 07104

(201) 485-3211-2 • Fax: (201) 485-4870

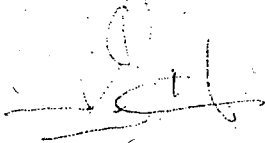
Emergency and Remedial Response Division
U.S. Environmental Protection Agency
290 Broadway, 17th Floor
Office of Regional Counsel
New York, New York 10007-1866

January 28, 1997

To Ms. Amelia Wagner,

As per request, please find enclosed a re-submittal to the following responses to the "Request for Information" received on July 10, 1996 at Chemical Compounds Inc.. The reason for the re-submittal was to further verify specific responses which our company regards confidential information. If you should have any further questions or require additional information, please feel free to contact Jim Giannotti at (201) 485 - 3212.

Sincerely,



Jim Giannotti
jg./JG
c.c: AC/SG

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ATTACHMENT A

REQUEST FOR INFORMATION

Background

The United States Environmental Protection Agency ("EPA") is investigating the release of hazardous substances into the Passaic River. EPA has information indicating that hazardous substances from your facility located at 29-75 Riverside Avenue in Newark, New Jersey may have been discharged into the Passaic River.

Please provide the information requested below, including copies of all available documentation that supports your answers.

1) How long has your company operated at the facility designated above? If your company no longer operates at this facility, during what years did your company operate at the facility?

2) a) Does your company have or has it in the past had a permit or permits issued pursuant to the Resource Conservation and Recovery Act, 42 U.S.C. §6901 et seq.? If "yes", please provide the years that your company held such a permit and its EPA Identification Number.

b) Does your company have or has it in the past had a permit or permits issued pursuant to the Federal Water Pollution Control Act, 33 U.S.C. § 1251, et seq.? If "yes", please provide the years that your company held such a permit.

3) Did your company receive, utilize, manufacture, discharge, release, store or dispose of any materials containing the following substances:

	Yes	No
2,3,7,8 tetrachlorodibenzo-p-dioxin	_____	_____
or other dioxin compounds	_____	_____
Acetic acid	_____	_____
Adipic acid	_____	_____
Ammonia	_____	_____
Aniline	_____	_____
Benzene	_____	_____
Benzo(a)anthracene	_____	_____
Benzoic acid	_____	_____
Benzyl chloride	_____	_____
Butyl benzyl phthalate	_____	_____
Chlorobenzene	_____	_____
Chloroethylene	_____	_____
Chloroform	_____	_____
1,2-dichloroethene	_____	_____
Di-n-butyl phthalate	_____	_____
Ethyl benzene	_____	_____

	Yes	No
Fluoranthene	_____	_____
Methanol	_____	_____
Methylene Chloride	_____	_____
2-methylnapthalene	_____	_____
Naptha distillate	_____	_____
Napthalene	_____	_____
2-nitrophenol	_____	_____
Petroleum ether	_____	_____
Phenanthrene	_____	_____
Pyrene	_____	_____
Tetrachlorobenzene	_____	_____
Tetrachloroethane	_____	_____
Tetrachloroethylene	_____	_____
Trichloroethane	_____	_____
Trichloroethylene	_____	_____
Toluene -	_____	_____
Xylene	_____	_____
Arsenic	_____	_____
Cadmium	_____	_____
Chromium	_____	_____
Copper	_____	_____
Lead	_____	_____
Mercury	_____	_____
Nickel	_____	_____
Silver	_____	_____
Zinc	_____	_____
Cyanide	_____	_____
PCBs	_____	_____

4) a) Provide a description of the manufacturing processes for which all hazardous substances, including, but not limited to, the substances listed in response to item (3), were a product or by-product.

b) During what parts of the manufacturing processes identified in the response to items (4)(a), above, were hazardous substances, including, but not limited to, the substances listed in response to item (3), generated?

i) Describe the chemical composition of these hazardous substances.

ii) For each process, what amount of hazardous substances was generated per volume of finished product?

iii) Were these hazardous substances combined with wastes from other processes? If so, wastes from what processes?

5) Describe the methods of collection, storage, treatment, and disposal of all hazardous substances, including, but not limited to, the substances listed in response to item (3) and (4). Include information on the following:

a) Identify all persons who arranged for and managed the processing, treatment, storage and disposal of hazardous substances.

b) If hazardous substances were taken off-site by a hauler or transporter, provide the names and addresses of the waste haulers and the disposal site locations.

c) Describe all storage practices employed by your company with respect to all hazardous substances from the time operations commenced until the present. Include all on-site and off-site storage activities.

i) If drums were stored outside, were the drums stored on the ground or were they stored on areas that had been paved with asphalt or concrete? Please provide a complete description of these storage areas.

ii) When drums were stored outside, were empty drums segregated from full drums?

d) What processes do you use to treat your waste? What do you do with the waste after it is treated?

6) a) For process waste waters generated at the facility which contained any hazardous substances, including, but not limited to, the substances listed in response to item (3) and (4):

i) Was the waste stream discharged into a sanitary sewer and if so, during what years?

ii) Were they treated before being discharged to the sanitary sewer and if so, how? Please be specific.

iii) If the waste waters were not discharged to the sanitary sewer, where were they disposed and during what years?

iv) Please provide the results of any analyses performed on any waste process streams generated at the facility.

b) For floor drains or other disposal drains at the facility:

- i) Did the drains connect to a sanitary sewer and if so, during what years?
- ii) If the floor drains or other disposal drains at the facility were not discharged to the sanitary sewer, where did they discharge and during what years?
- c) i) Did any storm sewers, catch basins or lagoons exist at any time at the facility and if so, during what years?
 - ii) If catch basins or lagoons existed, were they lined or un-lined?
 - iii) What was stored in the lagoons?
 - iv) Where was the discharge from any of these structures released and during what years? Was this discharge treated before its release and if so, how and during what years? What was the chemical composition of any waste waters released, and during which years?
- d) Please supply diagrams of any waste water collection, transport or disposal systems on the property.
- e) Also, EPA has information relating to several instances of discharge of process waste water into the sewer system in 1992 and 1995. Please provide a detailed description of these incidents.
- 7) a) For each hazardous substance, including, but not limited to, the substances listed in response to item (3) or identified in the responses to item (4), above, provide the total amount generated during the operation of the facility on an annual basis.
- b) Were any hazardous substances, including, but not limited to, the substances listed in response to item (3) or identified in the responses to item (4), above, disposed of in the Passaic River or discharged to the Passaic River? If yes, identify the hazardous substances, estimate the amount of material discharged to or disposed of in the Passaic River and the frequency with which this discharge or disposal occurred. Also please include any sampling of the river which you might have done after any discharge or disposal.
- 8) Please identify any leaks, spills, explosions, fires or other incidents of accidental material discharge that occurred at the facility during which or as a result of which any hazardous substances, including, but not limited to, the substances listed in response to item (3) or (4), were released on the property, into the waste water or storm drainage system at the facility or

to the Passaic River. Provide any documents or information relating to these incidents, including the ultimate disposal of any contaminated materials.

a) Please provide the results of any sampling of the soil, water, air or other media after any such incident and before and after clean-up. Please provide in this information all sampling performed for or by NJDEP.

b) Also, EPA has information that due to an industrial sewer line break in 1992, an unreported quantity of aniline was discharged to the Passaic River. Please provide all information relating to this and any other discharges and any measures taken to mitigate the impact of the discharges.

9) a) Was your facility ever subject to flooding. If so, was the flooding due to:

i) overflow from sanitary or storm sewer back-up, and/or

ii) flood overflow from the Passaic River?

b) Please provide the date and duration of each flood event.

10) Please provide a detailed description of any civil, criminal or administrative proceedings against your company for violations of any local, State or federal laws or regulations relating to water pollution or hazardous waste generation, storage, transport or disposal. Provide copies of all pleadings and depositions or other testimony given in these proceedings.

a) EPA has information that your facility has received several notices of violation for discharges of waste water into the sewer system, including a NJDEPE Field Notice of Violation issued on January 7, 1992 and a PVSC Notice of Violation issued on February 9, 1995. Please provide information on how these violations were resolved.

11) Provide a copy of each document which relates to the generation, purchase, use, handling, hauling, and/or disposal of all hazardous substances, including, but not limited to, the substances listed in response to item (3) or (4). If you are unable to provide a copy of any document, then identify the document by describing the nature of the document (e.g. letter, file memo, invoice, inventory form, billing record, hazardous waste manifest, etc.). Describe the relevant information contained therein. Identify by name and job title the person who prepared the document. If the document is not readily available, state where it is stored, maintained, or why it is unavailable.

12) a) Did you or anyone else sample the soil, ground water, surface water, ambient air or other environmental media at the facility for purposes other than those identified in questions above?

b) If so, please provide all other documents pertaining to the results of these analyses.

13) a) Has your company owned the facility at the location designated above? If so, from whom did your company purchase the property and in what year? If your company subsequently sold the property, to whom did your company sell it and in what year? Please provide copies of any deeds and documents of sale.

b) If your company did not own the facility, from whom did your company rent the facility and for what years? Please provide copies of any rental agreements.

c) To the extent that you know, please provide the names of all parties who owned or operated the facility during the period from 1940 through the present. Describe the relationship, if any, of each of those parties with your company.

14) Answer the following questions regarding your business or company. In identifying a company that no longer exists, provide all the information requested, except for the agent for service of process. If your company did business under more than one name, list each name.

a) State the legal name of your company.

b) State the name and address of the president or the chairman of the board, or other presiding officers of your company.

c) Identify the state of incorporation of your company and your company's agent for service of process in the state of incorporation and in New Jersey.

d) Provide a copy of your company's "Certificate of Incorporation" and any amendments thereto.

e) If your company is a subsidiary or affiliate of another company, or has subsidiaries, or is a successor to another company, identify these related companies. For each related company, describe the relationship to your company; indicate the date and manner in which each relationship was established.

f) Identify any predecessor organization and the dates that such company became part of your company.

- g) Identify any other companies which were acquired by your company or merged with your company.
- h) Identify the date of incorporation, state of incorporation, agents for service of process in the state of incorporation and New Jersey, and nature of business activity, for each company identified in the responses to items (14)(e), (f), and (g), above.
- i) Identify all previous owners or parent companies, address(es), and the date change in ownership occurred.

15) Provide the name, address, telephone number, title and occupation of the person(s) answering this "Request for Information" and state whether such person(s) has personal knowledge of the responses. In addition, identify each person who assisted in any way in responding to the "Request for Information" and specify the question to which each person assisted in responding. Please include the names and addresses of former employees who were contacted to respond to any of the questions.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of New Jersey :

County of Essex :

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that my company is under a continuing obligation to supplement its response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or the company's response thereto should become known or available to the company.

Alberto Celleri
NAME (print or type)

President
TITLE (print or type)

Alberto Celleri
SIGNATURE

Sworn to before me this
day of 29th Jan., 1997

[Signature]
Notary Public

EDMUND M. AGOSTA
NOTARY PUBLIC OF NEW JERSEY
My Comm. Expires Aug. 16, 1993

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CONFIDENTIAL

INFORMATION CONTAINED HEREIN RESPONSE TO QUESTION # (4a) CONCERNS PRODUCTS, MATERIALS AND PROCESSES IS PROPRIETARY AND CONFIDENTIAL AND MEETS THE REQUIREMENTS OF 42 U.S.C. §9604(e)(7)(E)

CHEMICAL COMPOUNDS, INC.
RESPONSE TO REQUEST FOR INFORMATION DATED JULY 9, 1996

The following are the responses of Chemical Compounds, Inc. to the Request for Information from the United States Environmental Protection Agency, dated July 9, 1996.

1. Chemical Compounds, Inc. (CCI) has operated at the facility in Building #17 at 29-75 Riverside Avenue since 1990. It acquired the facility in July, 1986 (See Deed - Attachment 1) and installed equipment through 1990. During the 1986-1990 period it contracted with another entity for the manufacture of its products (See, Termination Notice to Southwest Photo Chem., Inc. - Attachment 1).

2. (a) Yes, CCI has had a permit pursuant to the Resource Conservation and Recovery Act since 1990. Chemical Compounds Inc.'s EPA Identification # is NJD 108661737. (See Acknowledgement of Notification of Hazardous Waste Activity - Attachment 2.)

(b) Yes, CCI has a permit pursuant to the Federal Water Pollution Control Act, its amendments, the Clean Water Act and the Rules and Regulations of the Passaic Valley Sewerage Commissioners. The Permit Number is 20407122 and CCI has had the permit since July 20, 1992. (See copy of the Sewer Connection Permit with Passaic Valley Sewerage Commissioners-Attachment 3.)

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3. Yes, the following is CCI's response to question No. 3.

Hazardous Material	Yes	No
2,3,7,8 Tetrachlorodibenzo-p-dioxin or other Dioxin Compounds		X
Acetic Acid	X	
Adipic Acid	X	
Aniline	X	
Benzene	X	
Benzo(a)anthracene		X
Benzoic Acid	X	
Benzy Chloride		X
Butyl Benzyl Phthalate		X
Chlorobenzene	X	
Chloroethylene		X
Chloroform	X	
1,2-Dichloroethene		X
Di-n-butyl phthalate		X
Ethyl Benzene	X	
Fluoranthene		X
Methanol	X	
Methylene Chloride	X	
2-Methylnapthalene		X
Naptha distillate		X
Naphthalene	X	
2-Nitrophenol	X	
Petroleum Ether		X
Phenanthrene		X
Pyrene		X
Tetrachlorobenzene		X
Tetrachloroethane		X
Tetrachloroethylene	X	
Trichloroethane		X
Trichloroethylene		X
Toluene	X	
Xylene	X	

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Arsenic		X
Cadmium		X
Chromium		X
Copper		X
Lead	X	
Mercury		X
Nickel		X
Silver		X
Zinc	X	
Cyanide	X	
PCBs		X

REDACTED

**INFORMATION CONTAINED HEREIN RESPONSE TO QUESTION # 4a CONCERNS
PRODUCTS, MATERIALS AND PROCESSES IS PROPRIETARY AND
CONFIDENTIAL AND MEETS THE REQUIREMENTS OF 42 U.S.C. §9604(e)(7)(E)**

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REDACTED

**INFORMATION CONTAINED HEREIN RESPONSE TO QUESTION # 4a CONCERNS
PRODUCTS, MATERIALS AND PROCESSES IS PROPRIETARY AND
CONFIDENTIAL AND MEETS THE REQUIREMENTS OF 42 U.S.C. §9604(e)(7)(E)**

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REDACTED

**INFORMATION CONTAINED HEREIN RESPONSE TO QUESTION # 4a CONCERNS
PRODUCTS, MATERIALS AND PROCESSES IS PROPRIETARY AND
CONFIDENTIAL AND MEETS THE REQUIREMENTS OF 42 U.S.C. §9604(e)(7)(E)**

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REDACTED

**INFORMATION CONTAINED HEREIN RESPONSE TO QUESTION # 4a CONCERNS
PRODUCTS, MATERIALS AND PROCESSES IS PROPRIETARY AND
CONFIDENTIAL AND MEETS THE REQUIREMENTS OF 42 U.S.C. §9604(e)(7)(E)**

866300015

REDACTED

**INFORMATION CONTAINED HEREIN RESPONSE TO QUESTION # 4a CONCERNS
PRODUCTS, MATERIALS AND PROCESSES IS PROPRIETARY AND
CONFIDENTIAL AND MEETS THE REQUIREMENTS OF 42 U.S.C. §9604(e)(7)(E)**

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REDACTED

**INFORMATION CONTAINED HEREIN RESPONSE TO QUESTION # 4a CONCERNS
PRODUCTS, MATERIALS AND PROCESSES IS PROPRIETARY AND
CONFIDENTIAL AND MEETS THE REQUIREMENTS OF 42 U.S.C. §9604(e)(7)(E)**

4(b) Attachment 4 contains a list of process waste water streams and their respective hazardous waste components.

- i) The hazardous components generated as by-products in the waste water stream due to the impurity of the raw materials are detected in ppb concentrations, and are noted in Attachment 4.**
- ii) The amount of hazardous substances generated per volume of each finished product is not available. The hazardous substances generated in the waste water stream of various products are contained in the range of 500 - 1500 gallons of 99.99 % water. Therefore, an estimated amount of hazardous substances generated per volume of water is < 0.01 %. (See Attachment 4.)**

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iii) The hazardous substances located in the waste water stream are generated on batch scale operations. The by-products are present in the waste water stream after the separation of the product by filtration. After filtration, the waste water stream is treated for regulated effluent exceedances. After treatment, the waste water is stored in a 10,000 gallon tank. A number of process waste water streams will combine in the 10,000 gallon storage tank.

5 (a) The following table is a list of employees at CCI who were or are responsible for the management of hazardous substances:

Name	Title	Description of Responsibility
Alberto Celleri	Co-President	Overall Operations
Harold Sullivan	Co-President	Overall Operations
Arturo Celleri	Chemical/Environmental Engineer	Waste Water Treatment/Hazardous Substance Storage
Jim Giannotti	Chemical/Environmental Engineer	Waste Water Treatment/Hazardous Substance Storage

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5 (b) The following table is a list of transporters who were responsible for off-site disposal; including non-hazardous waste water:

Transporter's Name	Address	TSD Name & Address
Franks Vacuum Truck Services. Inc. NYD982792814	4500 Royal Ave. Niagara Falls, NY 14303	Research Oil Co. 2655 Transport Rd. Cleveland, OH 4415 OHD004178612
Freehold Cartage Inc. NJD054126164	P.O. Box 5010 Freehold, NJ 07728	Systech Environmental 11397 County Road 176 Paulding, OH 45879 OHD005048947
Laidlaw Environmental Services MDD980554653	3527 Whisky Bottom Road Laurel, MD 20424	Laidlaw Environmental Services 3527 Whisky Bottom Road Laurel, MD 20424
Maumee Express NJD986607380	P.O. Box 278 Somerville, NJ 08876	Rineco Chemical Ind. 1007 Vulcan Rd. - Haskell Benton, AR 72015 ARD981057870
Oldover Corporation VAD098443443	P.O. Box 68 Rt. 1, State Rd. 652 Arvonnia, VA 23004	Oldover Corporation P.O. Box 68 Rt. 1, State Rd. 652 Arvonnia, VA 23004
Freehold Cartage Inc. NJD054126164	P.O. Box 5010 Freehold, NJ 07728	ECOFLO 2750 Patterson Street Greensboro, Maryland 27407 NCD980842132
Chemical Waste Management of NJ NJD089216790	100 Lister Avenue Newark, NJ 07105	Chemical Waste Management of NJ 100 Lister Avenue Newark, NJ 07105
Tri-State Motor Transit Co. MOD095038998	P.O. 113 Joplin, MO 64802	Rineco Chemical Ind. 1007 Vulcan Rd - Haskell Benton, AR 72015 ARD981057870

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5 (c) i) & ii) The following table is a list of storage practices for the hazardous substances included in items (3) & (4) since the beginning of operations:

	Name of Hazardous Substance	Storage of the Hazardous Substance
Raw Materials or Laboratory Supplies	Acetic Acid	55 gallon Plastic Drum < 4 L Glass Bottle - Laboratory Scale 5,000 gallon Tanker Truck - Waste
	Adipic Acid	50 lb. Bags / 2000 lb. Palates < 1 lb. Glass Bottle - Laboratory Scale
	Ammonia	150 lb. Cylinder
	Benzoic Acid	50 lb. Bags / 2000 lb. Palates < 1 lb. Glass Bottle - Laboratory Scale
	Chloroform	< 4 L. Glass Bottle - Laboratory Scale 2 gal. Solvent Lab Disposal Container 55 gallon s/s drum - Waste 5,000 gallon Tanker Truck - Waste 4,000 gallon S/S Storage Tank - Waste
	Methanol	55 gallon Stainless Steel Drum 250 gallon Plastic Totes 4,000 gallon S/S Storage Tank - Waste 5,000 gallon Tanker Truck - Waste < 4 L. Glass Jars - Laboratory Scale 2 gal. Solvent Lab Disposal Container 55 gallon s/s drum - Waste
	Methylene Chloride	55 gallon Stainless Steel Drum 4,000 gallon S/S Storage Tank - Waste 5,000 gallon Tanker Truck - Waste < 4 L. Glass Jars - Laboratory Scale 2 gal. Solvent Lab Disposal Container 55 gallon s/s drum - Waste
	Toluene	55 gallon Stainless Steel Drum 4,000 gallon S/S Storage Tank - Waste 5,000 gallon Tanker Truck - Waste < 4 L. Glass Jars - Laboratory Scale 2 gal. Solvent Lab Disposal Container 55 gallon s/s drum - Waste
Waste Water Storage (ppb Concentrations) Based on Analytical Data	Xylene	55 gallon S/S Drum 250 gallon Plastic Totes 4,000 gallon S/S Storage Tank - Waste 5,000 gallon Tanker Truck - Waste < 4 L. Glass Bottles - Laboratory Scale 2 gal. Solvent Lab Disposal Container 55 gallon s/s drum - Waste
	By-Products found in the waste water stream: Aniline, Benzene, Benzoic Acid, Chlorobenzene, Chloroform, Ethyl Benzene, Methanol, Methylene Chloride Naphthalene, 2-NitroPhenol, Tetrachloroethylene, Toluene, Xylene, Lead, Zinc, Cyanide	55 gallon drum - Waste 400 - 4,000 gallon S/S Storage Tank 10,000 gallon S/S Storage Tank 5,000 gallon Tanker Trucks - Waste

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The 55 gallon drums or 250 gallon Plastic totes containing hazardous substances listed in items (3) & (4) are stored on wooden palates outside on either a paved area with asphalt or a concrete pad. (See Attachment 5 for a facility layout for the storage areas of hazardous substances.)

In December 1993, a concrete diked area was constructed outside the building located on the southeast part of the building with a capacity of 25,000 gallons. The diked area is within an 18 inch thick concrete berm approximately 4 feet high. Inside is the waste water storage area with (2) 4,000 gallon Above Ground S/S Storage tanks and (1) 10,000 gallon Above Ground S/S Storage Tank on top of an 8 inch concrete slab. In the past, the waste water and or flammable solvents such as methanol, xylene, & toluene were stored in a 5,000 gallon Tanker Truck in that same area. In addition, waste flammable liquids were stored in a 4,000 gallon Above Ground S/S Storage Tank in the diked area. Since September 1995, waste flammable liquids have been recycled. Currently, the 4,000 gallon S/S Storage Tank is being utilized for waste water storage.

Empty drums are segregated from full drums. The empty drums are located at the most southeastern part of the property, adjacent to or in an enclosed shed.

5 (d) The waste water streams are treated by neutralization, chemical precipitation, or carbon filtration. The process waste water streams are transferred to one of (2) 1,500 gallon mixing tanks for the introduction of treatment. One treatment involves neutralization by the addition of Sodium Hydroxide or Sulfuric Acid to meet discharge regulations. Another treatment involves carbon filtration for the removal of organics. The drain water is collected in an Above Ground S/S Storage Tank located in the basement and treated for heavy metals. The treatment for the drain water involves chemical precipitation with the addition of lime followed by filtration. After treatment, the waste water is transferred to a storage tank and analyzed.

If the treatments are effective, the waste water is transferred to a 10,000 gallon Above Ground S/S Storage tank. After the tank is full the waste water is combined with the sanitary waste water from the facility and pumped out of the building into the PVSC sanitary sewer which flows approximately 70 yards to an interceptor of the industrial park. The solid waste generated from treatment is non-hazardous and disposed off-site to a regulated facility. Carbon filtration and chemical precipitation treatment methods have only been used since October, 1995. Prior to that time, the waste water was treated by neutralization.

6 (a) i) From July 1992 to the present, the process waste water stream was discharged into a sanitary sewer connected with Passaic Valley Sewerage Commissioners. Before July, 1992, the process waste water stream was connected to a 5,000 gallon tanker truck for off-site disposal.

ii) Yes, the waste water stream is treated before discharging into the sanitary sewer. The water is treated by neutralization, chemical precipitation, and carbon filtration. (See 5 (d) for details of the treatment methods.)

iii) Before CCI obtained a permit for discharge to the sewer, the waste water stream was collected in a 5,000 gallon tanker truck. When the tanker truck achieved maximum capacity, the water would be sent to a TSD facility for treatment. CCI obtained a permit for discharging process waste water to the sewer on July 20, 1992. (See Attachment 11, for manifests.)

iv) Attachment 4 contains analytical results of process waste water streams.

6 (b) i) & ii) From 1986 - February, 1992, the main manufacturing floor at the facility was equipped with internal floor drains which were directly connected to the sanitary sewer. From February, 1992 through July, 1992, the drain water was collected into an above ground storage tank located on the basement floor and sent directly to a 5,000 gallon tanker truck. When the tanker truck became full, it was sent for off-site disposal. From July, 1992 - April, 1993, the drain water was sent to the 5,000 gallon Tanker Truck, then was combined with process waste water and then transferred to an above ground storage tank in the basement. After sampling and analysis for effluent exceedances, the waste water was combined in the basement with the sanitary waste water from the facility and pumped out of the building into the sanitary sewer. In April, 1993 CCI replaced the 5,000 gallon Tanker Truck with a 10,000 gallon above ground S/S Storage tank.

From 1995 to the present, the drain water has been transferred to an above ground S/S storage tank for the treatment of heavy metals by chemical precipitation. After treatment, the drain water is transferred to another above ground storage tank for analysis. If the treatment has been successful, the drain water is sent directly to the 10,000 gallon Storage Tank, and mixed with the process waste water. After the tank has accumulated to its maximum capacity, the waste water is combined with the sanitary waste water from the facility and pumped out of the building into the sanitary sewer which flows approximately 70 feet to an interceptor of the industrial park.

6 (c) i) There have been no storm sewers, catch basins, or lagoons located at Building # 17, 29-75 Riverside Ave., Newark, N.J. since the beginning of operations of CCI.

ii) N/A

iii) N/A

iv) N/A

6 (d) The facility layout for the collection, storage, and disposal of waste water can be located in Attachment 6.

6 (e) On January 7, 1992 the Newark Fire Department and the New Jersey DEP responded to a complaint of a discharge at the CCI facility. CCI's next door neighbor had plugged up the sewer line, and when CCI's personnel excavated the line to attempt to clear it, the contents of the line, including water colored purple with Red # 3 and Blue # 2 dye was disbursed into the excavation. This water was pumped out of the excavation onto the ground where it was observed by the Fire Department and DEP. CCI was ordered to clean up the discharge, which was analyzed and shown to be non-hazardous. (See analysis of soil and liquid samples - Attachment 8). CCI was charged with discharging to the PVSC sewer without a permit (See Attachment 7).

Subsequently, after CCI obtained a PVSC permit, it was cited by PVSC for having discharged waste water to the sewer which contained some volatile compounds and metals in excess of permitted concentrations. These discharges exceedances have been resolved, and current treatment methods appear to be keeping wastewater discharges within permitted parameters.

7 (a) The total amount of hazardous substances generated during the operation of the facility on an annual basis can not be determined. The hazardous substances which are contained in the waste water stream are determined by the purity of the raw materials. As a result, contaminant concentrations differ from one manufacturing batch to another.

7 (b) Chemical Compounds Inc. has not discharged any hazardous materials into the Passaic River.

8 (a) There have been no leaks, spills, explosive fires or other incidents that occurred at the CCI facility that resulted in hazardous substances being released.

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8 (b) CCI did not discharge any hazardous material into the Passaic River. (See answer to 6(e) for description of incident.)

9 (a) Yes, CCI's facility is subject to flooding due to the close proximity of the Passaic River. Flooding does occur due to the overflowing of the Passaic River. As a result, the water generated due to the flooding of the Passaic River is analyzed, treated and stored at our facility before discharging to the sewer.

9 (b) Flooding occurs during very bad storms, the dates of each occurrence are not known.

10 (a) In 1992, due to the discharge described in 6(e), CCI paid administrative costs to the New Jersey Department of Environmental Protection for the discharge response. The NJDEPE Case # is 92-01-07-1025. In addition, CCI was charged with violating the Water Pollution Control Act for negligently discharging a pollutant into a municipal treatment works without possessing a valid industrial pretreatment permit issued by the Passaic Valley Sewerage Commission. CCI pled guilty to a fourth degree water pollution violation with a fine of \$5,000 for the offense and had to provide a check in the amount of \$1,760.85 payable to the Office of the State Environmental Prosecutor to be used to purchase a one page advertisement in the Gloucester Times conveying a positive environmental message.

CCI also paid for administrative costs when the Bureau of Emergency Response responded to a chemical fire at the facility on October 5, 1993. The case was closed. The NJDEPE Case #'s are 93-10-05-0736 & 93-10-05-1110.

On September 14, 1994, CCI had received a Notice of Violation from the Division of Facility Wide Enforcement - NJDEP. The inspection identified a violation of the Solid Waste Management Act (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder. Remedial actions to correct the violations were implemented by CCI within days and no further enforcement was required thereafter.

With regard to violations of discharge permit limitations, CCI resolved the matter by entering into a Consent Order and Final Judgement with the Passaic Valley Sewage Commissioner on November 24, 1994, by which it paid \$6,000 to PVSC and entered into a compliance schedule, which was subsequently extended to July 1, 1996. (See Consent Order and Final Judgement and other relevant documents - Attachment 9 & 10.)

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11) For the purchasing of listed hazardous substances, such as raw materials, in item (3) or (4), the following table indicates CCI's suppliers since the beginning of operations. Documents such as invoices, bill of lading, and a purchase order book for receiving these hazardous substances are available.

Hazardous Substance - Raw Material	Supplier's Name	Supplier's Address
Acetic Acid	Brown Chemical	302 West Oakland Ave. Oakland, N.J. 07436
	Duso Chemical	173 Smith Street Poughkeepsie, N.Y. 12602
Adipic Acid	Brown Chemical	302 West Oakland Ave. Oakland, N.J. 07436
	Textile Chemical	990 Jersey Ave New Brunswick, N.J. 08901
Ammonia	Jones Chemical	80 Munson Street LeRoy, N.Y. 14482
Benzoic Acid	Textile Chemical	990 Jersey Ave. New Brunswick, N.J. 08901
	JLM Industries	8675 Hidden River Parkway Tampa, FL 33637
Methanol	Brown Chemical	302 West Oakland Ave. Oakland, N.J. 07436
	Textile Chemical	990 Jersey Ave New Brunswick, N.J. 08901
Methylene Chloride	Brown Chemical	302 West Oakland Ave. Oakland, N.J. 07436
	Textile Chemical	990 Jersey Ave New Brunswick, N.J. 08901
Toluene	Brown Chemical	302 West Oakland Ave. Oakland, N.J. 07436
	Textile Chemical	990 Jersey Ave New Brunswick, N.J. 08901
Xylene	Textile Chemical	990 Jersey Ave New Brunswick, N.J. 08901

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For laboratory supplies, the following table provides information regarding suppliers:

Laboratory Material Name	Supplier's Name	Supplier's Address
Acetic Acid	PCI Scientific Supply, Inc.	41 Plymouth Street Fairfield, N.J. 07004
Adipic Acid	J.T. Baker	89 Newbury Street Suite 103 Danvers, MA 01923
Benzoic Acid		
Chloroform		
Methylene Chloride		
Methanol	Fisher Scientific	711 Forbes Avenue Pittsburgh, PA 15219-4785
Toluene		
Xylene		

For the hauling and disposal of listed substances, such as waste water, plant and laboratory solvents, in items (3) or (4), the following table indicates CCI's past and present transporters and disposal facilities. Documents, such as manifests, for the disposal of these hazardous substances are in Attachment 11.

Hazardous Substance	Transporter Name	TSD Name
Methanol, Xylene Waste Flammable Liquids	Freehold Cartage Inc.	ECOFLO 2700 Patterson St. Greensboro, NC 27407
Dye Waste Water Non-Hazardous	Chemical Waste Management	Chemical Waste Management 100 Lister Ave. Newark, NJ 07105
Methanol, Xylene Waste Flammable Liquids	Oldover Corporation	Oldover Corporation Route 1, State Road 651 Arvonia, VA 23004
Chloroform, Methylene Chloride, Xylene Laboratory Solvents Waste Flammable Liquids	Tri-State Motor Transit Co.	Rineco 1007 Vulcan Rd. - Haskell Benton, AR 72015
Dye Waste Water Non-Hazardous	Laidlaw Environmental Services	Laidlaw Environmental Services 3527 Whiskey Bottom Rd. Laurel, MD 20724
Dye Waste Water Non-Hazardous	Maumee Express	Rineco 1007 Vulcan Rd. - Haskell Benton, AR 72015
Waste Dye (HC Yellow # 2)	Franks Vacuum Truck Service Inc.	Research Oil Company 2655 Transport Rd. Cleveland, OH 44115
Methanol, Xylene Waste Flammable Liquids	Freehold Cartage Inc.	Systech Environmental 11397 County Rd. 176 Paulding, OH 45879

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12 a) & b) There has been no sampling of the soil, ground water, or surface water at the facility for purposes other than those identified in the responses above. However, an Occupational Health Survey was conducted by CCI's insurance company to evaluate employee exposure to possible various airborne contaminants. The survey included air sampling for xylene, methanol and others. As a result, none of the employees' exposures exceeded the OSHA Permissible Exposure Levels for the above contaminants. Attachment 12 contains the report provided by CCI's insurance company.

13 a) Yes, CCI has owned the facility at 29-75 Riverside Ave. - Building # 17 since July 1, 1986. Attachment 1 contains a copy of the deed of sale. The property was purchased from Industrial Development Associates, Inc..

13 b) N/A

13 c) In 1888 the Freeholders of Essex County sold the property to Triton Boat Club of Newark. This transaction is recorded in Essex County Deed Book K-24, Page 133. On May 16, 1902, Patton Paint Company acquired the property from the Triton Boat Club of Newark, as recorded in Deed Book L-35, Page 270. Patton Paint Company was a manufacturer of paint and varnishes.

Thereafter, Pittsburgh Plate Glass Co. which manufactured paint and varnishes, took the subject property. The property was identified as Block 614, Lot 1. The current facility - Building # 17 - was constructed by the Pittsburgh Plate Glass Co. as a chemical resin manufacturing facility for its operation. PPG, Inc. which was formerly called Pittsburgh Plate Glass Co. purchased the property on January 31, 1941, and held the property to August 2, 1971.

In 1971, the site was sold to a developer, Riverside Ave. Properties, Inc. Deed Book 4382, Page 1023. Riverside Ave. Properties, Inc. thereafter leased the site. On October 11, 1979, the property was sold to another developer, Industrial Development Corporation, which sold the property a month later to Industrial Development Associates. The principal of Industrial Development Associates is Anthony V. Pugliese, III. Industrial Development Associates leased the building to S.B.S. Chemicals, Inc. and Desachem Co., Inc. manufacturers of chemicals and detergents. S.B.S. Chemicals and Desachem Co., Inc. occupied Building # 17 pursuant to a lease agreement with Industrial Development Associates, which argument expired on August 14, 1985. Thereafter, the building was vacant and the lot and block numbers were changed and subdivided from Block 614, Lot 1 (partial) to Block 614, Lot 66. CCI has no relationship with the past owners or tenants.

14 (a) The legal name of the company is Chemical Compounds Inc.

14 (b) The president of the company is Mr. Alberto Celleri. Mr. Celleri's address is 10 Baldwin Court, Roseland, NJ 07068.

14 (c) Chemical Compounds Inc. is incorporated in the state of New Jersey.

14 (d) Attachment 13 contains a copy of the company's "Certificate of Incorporation" and amendments thereto.

14 (e) CCI is not a subsidiary or affiliate of another company.

14 (f) Chemical Compounds Inc. has no predecessor organization.

14 (g) Chemical Compounds Inc. has not acquired nor merged with any other company.

14 (h) N/A

14 (i) There are no previous owners of CCI.

15. The person answering this Request for Information is Alberto Celleri, President of CCI, 10 Baldwin Court, Roseland, New Jersey 07068 (201) 364-0370. Mr. Celleri has personal knowledge of the responses. Mr. Jim Giannotti, 72 Califon Drive, Colonia, NJ 07067, (908) 382-5591, a Chemical Engineer at CCI, assisted with the preparation of these responses.

866300030

DEED

Industrial Development
Associates

TO

Chemical Compounds, Inc.

Grantee

George Garrison, Esquire
1735 Clifton Avenue
Clifton, New Jersey 07015

Record and return to:

DEED

This Deed is made on July 1, 1986

BETWEEN INDUSTRIAL DEVELOPMENT ASSOCIATES,
141 Lanza Avenue
Garfield, New Jersey

a corporation of the state of New Jersey
having its principal office at 141 Lanza Avenue, Garfield, New Jersey
referred to as the Grantor.

AND Chemical Compounds, Inc.

whose post office address is 10 Valley Road, Stanhope, New Jersey
referred to as the Grantee.

The word "Grantee" shall mean all Grantees listed above.

Transfer of Ownership. The Grantor grants and conveys (transfers ownership of) the property described below to the Grantee. This transfer is made for the sum of One Hundred Ninety Five Thousand (\$195,000.00) Dollars and 00/100-----

----- The Grantor acknowledges receipt of this money.

Tax Map Reference. (N.J.S.A. 46:15-2.1) Municipality of Newark
Block No. 614 Lot No. 66 Account No.
☐ No property tax identification number is available on the date of this Deed. (Check box if applicable.)

Property. The property consists of the land and all the buildings and structures on the land in the City of Newark
County of Essex and State of New Jersey. The legal description is:

Being known and described as proposed lot "C" as laid out and described on a certain subdivision map entitled "Proposed Subdivision Lot 1 - Block 614 Newark Tax Map" prepared by Borrie, MacDonald & Watson, dated June 25, 1984, and filed in the Essex County Register's Office on February 4, 1985 as Map No. 3594. This conveyance is made subject to and along with the right of ingress and egress along, over and through the easement area laid out and provided for in the aforementioned subdivision map.

See Schedule A attached hereto for additional description.

Prepared by:

REGISTERED
1986 SEP 11 AM 11:24
RECEIVED
OFFICE
RECORDED

866300031

SCHEDULE A

All those certain tract or parcel of land, and any improvements now or hereinafter constructed thereon lying and being in the County of Essex, in the City of Newark and the State of New Jersey, being further described as follows:

Being known and designated as Lot C in Block 614 as shown on Map entitled "Map of Subdivision of Lot 1 - Block 614" filed February 4, 1985 in the Essex County Register's Office as Map Number 3594.

Being further described as follows:

BEGINNING at a point where the Northeasterly boundary line of Lot B in Block 614, as shown on the above mentioned map, intersects the United States Pierhead and Bulkhead Line along the Passaic River, and running; thence:

- (1) Along said Pierhead and Bulkhead Line, North 38 degrees 47 minutes 20 seconds East 82.94 feet to a point; thence:
- (2) Continuing along said Pierhead and Bulkhead Line, North 31 degrees 09 minutes 20 seconds East 25.41 feet to a point; thence:
- (3) North 51 degrees 15 minutes 40 seconds West 100.00 feet to a point; thence:
- (4) North 89 degrees 43 minutes 30 seconds West 52.33 feet to a point; thence:
- (5) South 36 degrees 52 minutes 20 seconds West 79.00 feet to a point in the Northeasterly boundary line of Lot B; thence:
- (6) Along said Northeasterly boundary line of Lot B, South 52 degrees 37 minutes 40 seconds East 141.72 feet to a point in the United States Pierhead and Bulkhead Line and the point and place of BEGINNING.

Being also known as Lot 66 in Block 614 on the Tax Map of the City of Newark

The conveyance of the foregoing easement for ingress and egress is made expressly subject to the Grantee's obligation to maintain same at its own cost and expense in common with all others using same and it is understood that the Grantor shall have no responsibility or obligation in that regard whatsoever.

This conveyance is made subject to the following covenant which shall be construed as a covenant running with the land binding the Grantee, its successors and assigns.

The Grantee, its successors and assigns, shall be obligated to pay the Grantor, its successors and assigns, five (5%) percent of the cost of snow removal, guard service, and exterior janitorial and maintenance service attributable to the premises owned by the Grantor of which the premises conveyed hereunder formed a part. The Grantee covenants to pay any or all of the aforesaid costs within ten (10) days of the receipt of the Grantor's bill for same. In the event that the Grantee fails to pay any or all of the aforesaid costs within thirty (30) days of the receipt of Grantor's bill for same, said costs shall become a lien against these premises which lien shall be subordinate to any mortgage lien against these premises provided that the proceeds of such mortgage have been invested into the premises described above.

The Grantee also covenants with the Grantor to join any property owner's association formed subsequent to this conveyance to administer the terms of the covenant. The Grantor represents that it shall cause any of the remaining property owned by it at 29-75 Riverside Avenue, Newark, New Jersey, of which these premises formed a part, to be charged with a similar covenant and that it shall fairly and evenly administer same as to all of the premises affected.

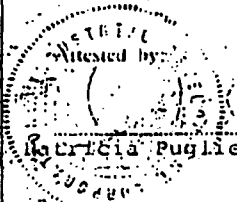
This conveyance is subject to easements and restrictions of record if any, zoning ordinances, state, county and municipal laws or ordinances affecting the premises and such state of facts as an accurate survey would reveal.

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Promises by Grantor. The Grantor promises that the Grantor has done no act to encumber the property. This promise is called a "covenant as to grantor's acts" (N.J.S.A. 46:4-6). This promise means that the Grantor has not allowed anyone else to obtain any legal rights which affect the property (such as by making a mortgage or allowing a judgment to be entered against the Grantor).

Signatures. This Deed is signed and attested to by the Grantor's proper corporate officers as of the date at the top of the first page. Its corporate seal is affixed.

BY: **INDUSTRIAL DEVELOPMENT ASSOCIATES**
INDUSTRIAL DEVELOPMENT CORPORATION
 General Partner



Patricia Pugliese

Secretary

By:

Anthony V. Pugliese, President

STATE OF NEW JERSEY, COUNTY OF Essex SS.

I CERTIFY that on July 1, 1986

Patricia Pugliese

personally came before me and this person acknowledged under oath, to my satisfaction, that:

- (a) this person is the secretary of Industrial Development Associates the corporation named in this Deed;
- (b) this person is the attesting witness to the signing of this Deed by the proper corporate officer who is Anthony V. Pugliese, III the President of the corporation;
- (c) this Deed was signed and delivered by the corporation as its voluntary act duly authorized by a proper resolution of its Board of Directors;
- (d) this person knows the proper seal of the corporation which was affixed to this Deed;
- (e) this person signed this proof to attest to the truth of these facts; and
- (f) the full and actual consideration paid or to be paid for the transfer of title is \$195,000.00.

(Such consideration is defined in N.J.S.A. 46:15-5.)

Signed and sworn to before me on July 1, 1986

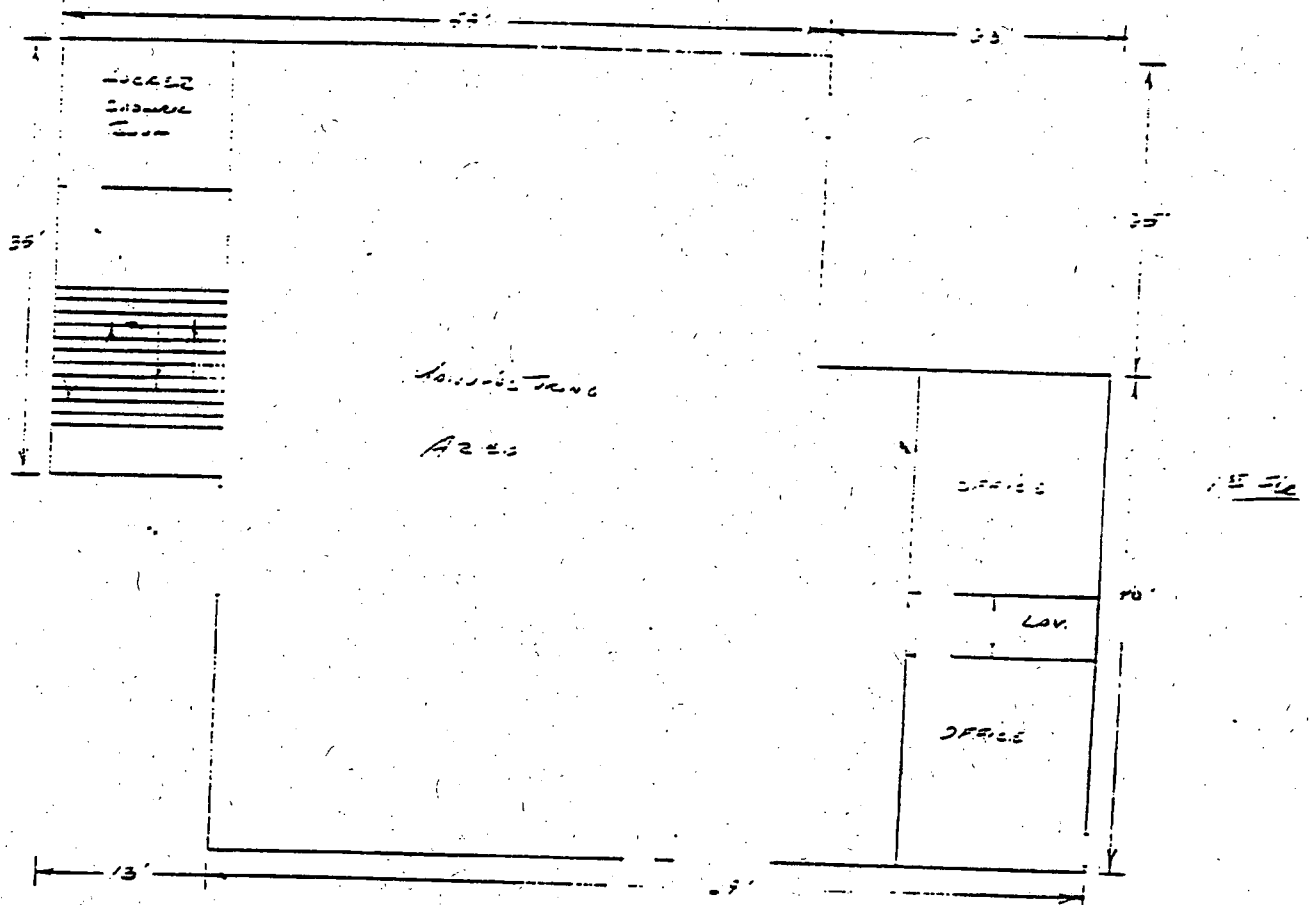
Henry Paper, an Attorney at Law of the State of New Jersey

(Print name of attesting witness below signature)
 Patricia Pugliese

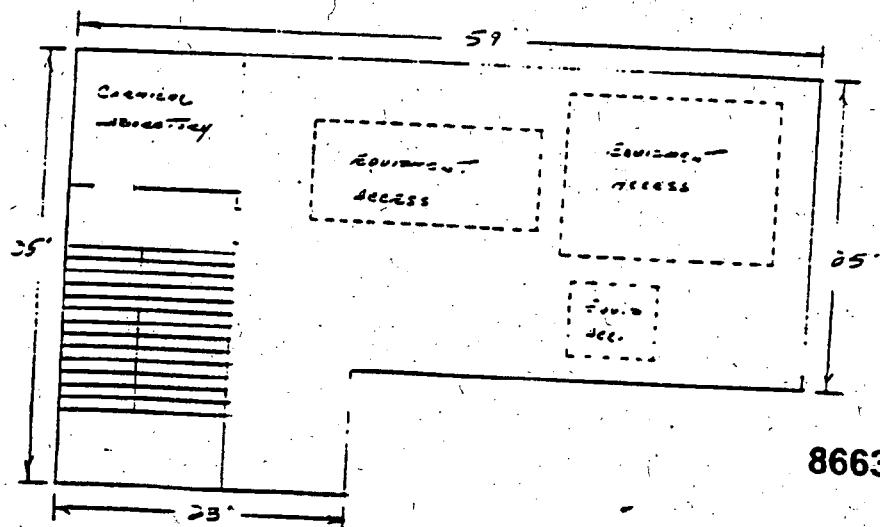
Prepared by: _____
 N.J.S.A. 46:15-11 (Print signer's name below signature)

866300034

DIAGRAM OF THE BUILDING



8' 11' 5' 16'



866300035



CHEMICAL COMPOUNDS, INC.

Riverside Industrial Park

29-75 Riverside Avenue - Newark, New Jersey 07104

201-435-1112

END — Dec 10, 1990

September 10, 1990

Southwest Photo Chem, Inc.
350 Electra Street
Pomona, California 91766

Attention: John Jeleniewski

Reference: Contract dated December 20, 1983

Dear John:

Back in 1983, we entered into a Contract dated December 20, 1983 whereby you agreed to perform certain services for us. Paragraph 8 of said Agreement provided that the Contract would extend for a period of five (5) years and annually thereafter unless either party gave the other ninety (90) days notice of termination.

The purpose of this letter is to give you ninety (90) days notice of termination of our Agreement of December 20, 1983 and any subsequent amendments thereto. You are advised that the restrictive covenant contained in the Agreement and the confidential information obtained under said arrangement with us is protected in accordance with our Agreement.

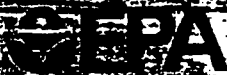
Our relationship has been a good relationship, and we appreciate the assistance you have given us in the past. Our arrangement is terminated in accordance with our Agreement and this letter.

Very truly yours,

CHEMICAL COMPOUNDS, INC.

By Harold E. Sullivan
Harold E. Sullivan
President

866300036



ACKNOWLEDGEMENT OF RECEIPT OF
OF HAZARDOUS WASTE CERTIFICATE

I hereby acknowledge that you have filed a Notification of Hazardous Waste at the installation located at the address shown in the box below, in accordance with the Resource Conservation and Recovery Act (RCRA) and the notification that installation appears in the box below. The EPA Compliance Guide is included on all shipping manifests for transporting hazardous waste. Reports that generators of hazardous waste, and owners and operators of treatment, storage and disposal facilities must file with EPA on all applications for Federal Hazardous Waste Permit, and other hazardous waste management reports, and documents required under Subtitle C of RCRA.

866300039

PASSAIC VALLEY SEWERAGE COMMISSIONERS**SEWER CONNECTION PERMIT****PERMIT #**

20407122

(Please use the Permit Number on any correspondence with PVSC)
In compliance with the provisions of the Federal Water Pollution Control Act,
its amendments, the Clean Water Act and the Rules and Regulations of the
Passaic Valley Sewerage Commissioners:

Chemical Compounds, Inc.

(herein, after referred to as the Permittee)
is authorized to discharge from a facility located at

29-75 Riverside Avenue - Building #17

Newark, New Jersey 07104

to the Passaic Valley Sewerage Commissioners Treatment Works in accordance
with discharge limitations, monitoring requirements and other conditions set forth
herein.

EFFECTIVE DATE

07/20/92

EXPIRATION DATE

07/20/97

PASSAIC VALLEY SEWERAGE COMMISSIONERS

Rev: 02/96

BY:


EXECUTIVE DIRECTOR

866300040

CHEMICAL COMPOUNDS INC.

WASTE WATER POLLUTANTS

The following is a list of pollutants detected in each specific waste water stream. The pollutants typed in **BOLD** face are detected regulated compounds in our waste water discharge. The numbers indicated in the table (and in parenthesis) are of an average concentration analyzed in-house or at an accredited laboratory - throughout the years.

WASTE WATER STREAM (COD Conc.)	PRIORITY POLLUTANTS				
	Heavy Metals		Cyanide Conc. (ppm)	Organics	
	Pb Conc. (ppm)	Zn Conc. (ppm)		VOA Conc. (ppb)	BNA Conc. (ppb)
NDAPA COD - 450,000 ppm	0.8	0.9	15	Methylene Chloride (38) Acetone (13,200) Chloroform (25) 1,2-Dichloroethane (130) Toluene (1650) Chlorobenzene (382) Ethylbenzene (26) Chloromethane (550) Benzene (960) o-Xylene (4150) m,p-Xylene (103)	Phenol (300) 2-Nitrophenol (450) Nitrobenzene (286) Aniline (2680) 2-Nitroaniline (800) 3-Nitroaniline (870)
HC Blue # 2 COD - 60,000 ppm	< 0.20	1.0	2.0	Tetrachloroethylene (220) Chloroform (19)	2-Nitrophenol (650) bis (2-Chloroethyl)Ether (440)
NHNFA COD - 42,000 ppm	< 0.20	0.3	< 0.10	Chloroform (22) Methylene Chloride (25) 1,2-Dichloroethane (1800) Toluene (41) Chlorobenzene (57) o-Xylene (32,000)	Phenol (320) 2-Nitrophenol (770) bis (2-Chloroisopropyl)Ether (7700) Nitrobenzene (73) 2-Nitroaniline (820) 3-Nitroaniline (860)
NPD COD - 82,000 ppm	< 0.20	0.35	0.20	Below MDL	Phenol (26) 2-Nitrophenol (155) Isophorone (180) 2-Nitroaniline (300) 3-Nitroaniline (980)

866300042

WASTE WATER STREAM (COD Conc.)	PRIORITY POLLUTANTS				
	Heavy Metals		Cyanide Conc. (ppm)	Organics	
	Pb Conc. (ppm)	Zn Conc. (ppm)		VOA Conc. (ppb)	BNA Conc. (ppb)
HC Yellow # 2 COD - 110,000 ppm	< 0.20	0.32	< 0.02	Chlorobenzene (2810) Xylenes (49,100) 1,2-Dichlorobenzene (169)	2-Chlorophenol (496) Nitrobenzene (259) 2-Nitrophenol (3380) 2-Nitroaniline (5510)
HC Yellow # 4 COD - 190,000 ppm	< 0.20	0.850	< 0.01	Methylene Chloride (594) 1,2-Dichloroethane (7200) Acetone (8600) Chloroform (53) Xylenes (260)	bis (2-chloroethyl) Ether (47,600) bis (2-Ethylhexyl) phthalate (107)
DNHA	1.43	0.9	< 0.01	Below MDL	2,4-Dinitrophenol (12,100)
HC Yellow # 5	1.43	0.8	< 0.01	1,2,4-Trichlorobenzene (44.2) 4-Chloroaniline (442)	Below MDL
NOPD COD - 225,000 ppm	0.269	0.277	< 0.05	Below MDL	Below MDL
HC Red # 3	< 0.20	0.372	< 0.01	Methylene Chloride (32) Chloroform (41) 2-Butanone (54) Bromodichloromethane (31) Toluene (17) m,p -Xylene (35) 1,2-Dichloroethane (50)	2-Nitroaniline (100)

**** MDL - Mean Detection Limit

866300043

ACCREDITED LABORATORIES, INC.
VOLATILE ORGANIC ANALYSIS DATA

CASE NUMBER 3180
SAMPLE NUMBER 9508936
A FILE A3540
CLIENT NAME CCI
FIELD ID NDAPA

MATRIX Aqueous
DILUTION FACTOR 10
DATE EXTRACTED
DATE ANALYZED 06/28/95
ANALYZED BY LARRY

CAS #	COMPOUND	UG/L	MOL
107028	Acrolein	U	61
107131	Acrylonitrile	U	66
74873	Chloromethane	550 W	20
74839	Bromomethane	300 W	20
75014	Vinyl Chloride	U	20
75003	Chloroethane	U	20
75092	Methylene Chloride	U	10
67641	Acetone	24000 W	19
75150	Carbon Disulfide	U	4.0
75694	Trichlorofluoromethane	U	4.0
75354	1,1-Dichloroethene	U	4.0
75343	1,1-Dichloroethane	U	4.0
156605	trans-1,2-Dichloroethene	U	4.0
67663	Chloroform	31 W	4.0
107062	1,2-Dichloroethane	U	4.0
78933	2-Butanone	1800	4.0
71556	1,1,1-Trichloroethane	U	4.0
56235	Carbon Tetrachloride	U	4.0
74054	Vinyl Acetate	U	8.0
74	Bromodichloromethane	U	4.0

CAS #	COMPOUND	UG/L	MOL
78875	1,2-Dichloropropane	U	4.0
10061015	cis-1,3-Dichloropropene	U	4.0
79016	Trichloroethene	U	4.0
71432	Benzene	960 W	4.0
124481	Dibromochloromethane	U	4.0
79005	1,1,2-Trichloroethane	U	4.0
10061026	trans-1,3-Dichloropropene	U	4.0
110758	2-Chloroethylvinylether	U	20
75252	Bromoform	U	4.0
591786	2-Hexanone	110	9.0
108101	4-Methyl-2-pentanone	68	7.0
127184	Tetrachloroethene	U	4.0
79345	1,1,2,2-Tetrachloroethane	U	6.0
108883	Toluene	1500 W	5.0
108907	Chlorobenzene	68 W	4.0
100414	Ethylbenzene	26	10
100425	Styrene	U	4.0
1330207	m,p-Xylene	37 W	28
95476	o-Xylene	250 W	21
156592	cis-1,2-Dichloroethene	U	4.0

SURROGATE COMPOUNDS	RECOVERY	LIMITS	STATUS
1,2-Dichloroethane-d4	101 %	76-114	OK
Toluene-d8	90 %	88-110	OK
Bromofluorobenzene	92 %	86-115	OK

J - Indicates compound concentration found below MOL.
U - Indicates compound analyzed for but not detected.

B - Indicates compound found in associated blank.
W - Result exceeds specific ground water quality criteria.*

* Flags are based on Specific Ground Water Quality Criteria from New Jersey Register dated February 1, 1993.

866300044

ACCREDITED LABORATORIES, INC.
BNA ORGANIC ANALYSIS DATA

CASE NUMBER 3180
SAMPLE NUMBER 9508936
DATA FILE 81194
TEST NAME CCI
FIELD ID NOAPA

MATRIX Aqueous
DILUTION FACTOR 50
DATE EXTRACTED 06/28/95
DATE ANALYZED 07/22/95
ANALYZED BY PAUL

CAS #	COMPOUND	UG/L	MDL
108952	Phenol	300 J	500
95578	2-Chlorophenol	U	500
95487	2-Methylphenol	U	500
108394	3&4-Methylphenol	U	500
88755	2-Nitrophenol	450 J	500
105679	2,4-Dimethylphenol	U	500
120832	2,4-Dichlorophenol	U	500
111444	bis-(2-Chloroethyl)Ether	U	500
541731	1,3-Dichlorobenzene	U	500
106467	1,4-Dichlorobenzene	U	500
100516	Benzyl Alcohol	U	1000
95501	1,2-Dichlorobenzene	U	500
108601	bis(2-Chloroisopropyl)ether	U	500
621647	N-Nitroso-Di-n-propylamine	U	500
67721	Hexachloroethane	U	500
98953	Nitrobenzene	74 JW	500
78591	Isophorone	U	500
65850	Benzoic Acid	U	2500
111911	bis-(2-Chloroethoxy)Methane	U	500
120821	1,2,4-Trichlorobenzene	U	500
203	Naphthalene	U	500
106478	4-Chloroaniline	U	1000
97683	Hexachlorobutadiene	U	500
91576	2-Methylnaphthalene	U	500
77474	Hexachlorocyclopentadiene	U	500
91587	2-Chloronaphthalene	U	500
88744	2-Nitroaniline	800 J	2500
131113	Dimethyl Phthalate	U	500
208968	Acenaphthylene	U	500
99092	3-Nitroaniline	870 J	2500
83329	Acenaphthene	U	500
132649	Dibenzofuran	U	500
606202	2,6-Dinitrotoluene	U	500

CAS #	COMPOUND	UG/L	MDL
59507	4-Chloro-3-methylphenol	U	1000
88062	2,4,6-Trichlorophenol	U	500
95954	2,4,5-Trichlorophenol	U	500
51285	2,4-Dinitrophenol	U	2500
100027	4-Nitrophenol	U	2500
534521	4,6-Dinitro-2-methylphenol	U	2500
87865	Pentachlorophenol	U	2500
121142	2,4-Dinitrotoluene	U	500
84662	Diethylphthalate	U	500
7005723	4-Chlorophenyl-phenylether	U	500
86737	Fluorene	U	500
100016	4-Nitroaniline	U	2500
86306	N-Nitrosodiphenylamine	U	500
101553	4-Bromophenyl-phenylether	U	500
118741	Hexachlorobenzene	U	500
85018	Phenanthrene	U	500
120127	Anthracene	U	500
84742	Di-n-Butylphthalate	U	500
206440	Fluoranthene	U	500
129000	Pyrene	U	500
85687	Butylbenzylphthalate	U	500
91941	3,3'-Dichlorobenzidine	U	1000
56553	Benzo(a)Anthracene	U	500
117817	Bis(2-Ethylhexyl)Phthalate	U	500
218019	Chrysene	U	500
117840	Di-n-octyl phthalate	U	500
205992	Benzo(b)fluoranthene	U	500
207089	Benzo(k)Fluoranthene	U	500
50328	Benzo(a)Pyrene	U	500
193395	Indeno(1,2,3-cd)Pyrene	U	500
53703	Dibenzo(a,h)Anthracene	U	500
191242	Benzo(g,h,i)Perylene	U	500
62759	N-Nitrosodimethylamine	U	500

SURROGATE COMPOUNDS

Nitrobenzene-d5
2-Fluorobiphenyl
Terphenyl-d14
Phenol-d5
2-Fluorophenol
2,4,6-Tribromophenol

RECOVERY

42 %
49 %
89 %
42 %
34 %
30 %

LIMITS

35-114
43-116
33-141
10- 94
21-100
10-123

STATUS

OK
OK
OK
OK
OK
OK

J - Indicates compound concentration found below MDL.
U - Indicates compound analyzed for but not detected.

B - Indicates compound found in associated blank.
W - Result exceeds specific ground water quality criteria.*

* Flags are based on Specific Ground Water Quality Criteria from New Jersey Register dated February 1, 1993.

* 3-Methylphenol and 4-Methylphenol can not be separated by the method applied

866300045



Integrated Analytical Laboratories, Inc.

273 Franklin Road
Randolph, N.J. 07869

201 361-4252
Fax: 201 989-5288

ANALYTICAL DATA REPORT

for

Chemical Compounds Inc.
29-75 Riverside Ave.
Newark, NJ 07101

Project Name: PVSC MONITORING
Lab Case Number: 10950 - 2904

HC BLUE #2

MDL = METHOD DETECTION LIMIT

< = LESS THAN THE MDL

VOLATILES Method 624

Lab ID: 2904-001
Client ID: 001
Matrix/Units: Aqueous - µg/L
Percent Moisture: 100

Date Sampled: 12/26/95
Time Sampled: 15:00
Date Analyzed: 1/2/96

Compound	Conc.	Q	MDL	Compound	Conc.	Q	MDL
Chloromethane	< 10.0		10.0	Bromodichloromethane	< 10.0		10.0
Vinyl Chloride	< 10.0		10.0	2-Chloroethyl Vinyl Ether	< 10.0		10.0
Bromomethane	< 10.0		10.0	cis-1,3-Dichloropropene	< 10.0		10.0
Chloroethane	< 10.0		10.0	Toluene	< 10.0		10.0
Trichlorofluoromethane	< 10.0		10.0	trans-1,3-Dichloropropene	< 10.0		10.0
1,1-Dichloroethene	< 10.0		10.0	1,1,2-Trichloroethane	< 10.0		10.0
Methylene Chloride	< 20.0		20.0	Tetrachloroethene	< 10.0		10.0
trans-1,2-Dichloroethene	< 10.0		10.0	Dibromochloromethane	< 10.0		10.0
1,1-Dichloroethane	< 10.0		10.0	Chlorobenzene	< 10.0		10.0
Chloroform	18.8		10.0	Ethylbenzene	< 10.0		10.0
1,1,1-Trichloroethane	< 10.0		10.0	Total Xylenes	< 10.0		10.0
Carbon Tetrachloride	< 10.0		10.0	Bromoform	< 10.0		10.0
1,2-Dichloroethane	< 10.0		10.0	1,1,2,2-Tetrachloroethane	< 10.0		10.0
Benzene	< 10.0		10.0	1,3-Dichlorobenzene	< 10.0		10.0
Trichloroethene	< 10.0		10.0	1,4-Dichlorobenzene	< 10.0		10.0
1,2-Dichloropropane	< 10.0		10.0	1,2-Dichlorobenzene	< 10.0		10.0

TOTAL CYANIDE Method 335.2

Lab ID: 2904-001
Client ID: 001
Matrix/Units: Aqueous - mg/L
Percent Moisture: 100

Date Sampled: 12/26/95
Time Sampled: 15:00
Date Analyzed: 1/2/96

Result

MDL

1.00

0.05

2.42

All NJDEP protocol were followed during analyses. These data have been reviewed and accepted by:

Michael H. Leftin
Michael H. Leftin, Ph.D.
Laboratory Director

The liability of Integrated Analytical Laboratories, Inc. is limited to the actual cost of the analyses performed.



Integrated Analytical Laboratories, Inc.

273 Franklin Road
Randolph, N.J. 07869

201 361-4252
Fax: 201 989-5288

ANALYTICAL DATA REPORT

for

Chemical Compounds, Inc.
29-75 Riverside Ave.
Newark, NJ 07101

HC-BLUE #2

Project Name : PVSC - MONITORING

Lab Case Number : 10950 - 2903

MDL = METHOD DETECTION LIMIT

< = LESS THAN THE MDL

SEMIVOLATILES - BASE NEUTRALS

Method 625

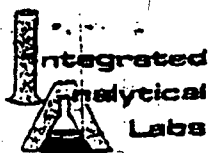
Lab ID : 2903-01
Client ID : 001
Matrix/Units : Aqueous - µg/L
Percent Moisture : 100

Date Sampled : 12/26/95
Time Sampled : 15:00
Date Analyzed : 1/11/96

Compound	Conc.	Q	MDL	Compound	Conc.	Q	MDL
N-Nitrosodimethylamine	< 100		100	Diethylphthalate	< 100		100
Aniline	< 100		100	Fluorene	< 100		100
bis(2-Chloroethyl)ether	< 100		100	4-Chlorophenyl-phenylether	< 100		100
1,3-Dichlorobenzene	< 100		100	4-Nitroaniline	< 100		100
-Dichlorobenzene	< 100		100	N-Nitrosodiphenylamine	< 100		100
benzyl alcohol	< 100		100	1,2-Diphenylhydrazine/Azobenzene	< 100		100
1,2-Dichlorobenzene	< 100		100	4-Bromophenyl-phenylether	< 100		100
bis(2-chloroisopropyl)ether	< 100		100	Hexachlorobenzene	< 100		100
N-Nitroso-di-n-propylamine	< 100		100	Phenanthrene	< 100		100
Hexachloroethane	< 100		100	Anthracene	< 100		100
Nitrobenzene	< 100		100	Carbazole	< 100		100
Isophorone	< 100		100	Di-n-butylphthalate	< 100		100
bis(2-Chloroethoxy)methane	< 100		100	Fluoranthene	< 100		100
1,2,4-Trichlorobenzene	< 100		100	Benzidine	< 100		100
Naphthalene	< 100		100	Pyrene	< 100		100
4-Chloroaniline	< 100		100	3,3'-Dimethylbenzidine	< 100		100
Hexachlorobutadiene	< 100		100	Butylbenzylphthalate	< 100		100
2-Methylnaphthalene	< 100		100	3,3'-Dichlorobenzidine	< 100		100
Hexachlorocyclopentadiene	< 100		100	Benzo[a]anthracene	< 100		100
2-Chloronaphthalene	< 100		100	Chrysene	< 100		100
2-Nitroaniline	< 100		100	bis(2-Ethylhexyl)phthalate	< 100		100
Dimethylphthalate	< 100		100	Di-n-octylphthalate	< 100		100
2,6-Dinitrotoluene	< 100		100	Benzo[b]fluoranthene	< 100		100
Acenaphthylene	< 100		100	Benzo[k]fluoranthene	< 100		100
3-Nitroaniline	< 100		100	Benzo[a]pyrene	< 100		100
Acenaphthene	< 100		100	Indeno[1,2,3-cd]pyrene	< 100		100
2,4-Dinitrotoluene	< 100		100	Dibenz[a,h]anthracene	< 100		100
Dibenzofuran	< 100		100	Benzo[g,h,i]perylene	< 100		100

Q = Qualifier

866300047



Integrated Analytical Laboratories, Inc.

273 Franklin Road
Randolph, N.J. 07869

201 361-4252
Fax: 201 989-5288

ANALYTICAL DATA REPORT

for
Chemical Compounds, Inc.
29-75 Riverside Ave.
Newark, NJ 07101

Project Name : PVSC - MONITORING
Lab Case Number : 10950 - 2903

HC 610E #2

MDL = METHOD DETECTION LIMIT

< = LESS THAN THE MDL

SEMIVOLATILES - ACIDS Method 625

Lab ID : 2903-01
Client ID : 001
Matrix/Units : Aqueous - µg/L
Percent Moisture: 100

Date Sampled : 12/26/95
Time Sampled : 15:00
Date Analyzed : 1/11/96

Compound	Result	Q	MDL
Phenol	< 100		100
2-Chlorophenol	< 100		100
2-Methylphenol	< 100		100
4-Methylphenol	< 100		100
Nitrophenol	< 100		100
4,4-Dimethylphenol	< 100		100
Benzoic acid	20400		1000
2,4-Dichlorophenol	< 100		100
4-Chloro-3-methylphenol	< 100		100
2,4,6-Trichlorophenol	< 100		100
2,4,5-Trichlorophenol	< 100		100
2,4-Dinitrophenol	< 100		100
4-Nitrophenol	< 100		100
4,6-Dinitro-2-methylphenol	< 100		100
Pentachlorophenol	< 100		100

METALS EPA Series 200

Lab ID : 2903-01
Client ID : 001
Matrix/Units : Aqueous - mg/L
Percent Moisture: 100

Date Sampled : 12/26/95
Time Sampled : 15:00
Date Analyzed : 1/11/96

Compound	Result	Q	MDL
Lead	< 0.04		0.04
Zinc	0.22		0.02

Q = Qualifier

866300048

01-15-1996 04:53PM

FROM INTEGRATED ANALYTICAL LAB TO

7725998

P.04

**Integrated Analytical Laboratories, Inc.**273 Franklin Road
Randolph, N.J. 07869201 361-4252
Fax: 201 989-5288**ANALYTICAL DATA REPORT**

for

Chemical Compounds, Inc.
29-75 Riverside Ave.
Newark, NJ 07101

Project Name : PVSC - MONITORING

Lab Case Number : 10950 - 2903

f.c. Blue #2

MDL = METHOD DETECTION LIMIT**< = LESS THAN THE MDL****GENERAL ANALYTICAL**

Lab ID : 2903-01

Client ID : 001

Matrix/Units : Aqueous - mg/L

Percent Moisture: 100

Date Sampled : 12/26/95

Time Sampled : 15:00

Compound (Method)	Result Q	MDL	Date Analyzed
Biochemical Oxygen Demand (405.1)	18600	NA	1/2/96
Total Suspended Solids (160.2)	< 10.0	10.0	1/3/96

Q = Qualifier

All NJDEP protocol were followed during analyses. These data have been reviewed and accepted by:

Michael H. Leftin, Ph.D.
Laboratory Director

The liability of Integrated Analytical Laboratories, Inc. is limited to the actual cost of the analyses performed.

866300049

ACCREDITED LABORATORIES, INC.
VOLATILE ORGANIC ANALYSIS DATA

CASE NUMBER 2616
SAMPLE NUMBER 9506616
DATA FILE >09873
CLIENT NAME CCI
FIELD ID NMFA

MATRIX Aqueous
DILUTION FACTOR 1.0
DATE EXTRACTED _____
DATE ANALYZED 05/24/95
ANALYZED BY LARRY

CAS #	COMPOUND	UG/L	MDL	CAS #	COMPOUND	UG/L	MDL
107028	Acrolein	U	6.1	78875	1,2-Dichloropropane	U	.4
107131	Acrylonitrile	U	6.6	10061015	cis-1,3-Dichloropropene	U	.4
74873	Chloromethane	U	2.0	79016	Trichloroethene	U	.4
74839	Bromomethane	U	2.0	71432	Benzene	U	.4
75014	Vinyl Chloride	U	2.0	124481	Dibromochloromethane	U	.4
75003	Chloroethane	U	2.0	79005	1,1,2-Trichloroethane	U	.4
75092	Methylene Chloride	U	1.0	10061026	trans-1,3-Dichloropropene	U	.4
67641	Acetone	U	1.8	110758	2-Chloroethylvinylether	U	2.0
75150	Carbon Disulfide	U	.4	75252	Bromoform	U	.4
75694	Trichlorofluoromethane	U	.4	591786	2-Hexanone	U	.9
75354	1,1-Dichloroethene	U	.4	108101	4-Methyl-2-pentanone	U	.7
75343	1,1-Dichloroethane	U	.4	127184	Tetrachloroethene	U	.4
156605	trans-1,2-Dichloroethene	U	.4	79345	1,1,2,2-Tetrachloroethane	U	.6
67663	Chloroform	2.1	.4	108883	Toluene	U	.5
107062	1,2-Dichloroethane	U	.4	108907	Chlorobenzene	U	.4
78933	2-Butanone	U	.4	100414	Ethylbenzene	U	1.0
71556	1,1,1-Trichloroethane	U	.4	100425	Styrene	U	.4
56235	Carbon Tetrachloride	U	.4	1330207	m,p-Xylene	U	2.8
108054	Vinyl Acetate	U	.8	95476	o-Xylene	.8	2.1
75274	Bromodichloromethane	U	.4	156592	cis-1,2-Dichloroethene	U	.4

SURROGATE COMPOUNDS

1,2-Dichloroethane-d4
Toluene-d8
Bromofluorobenzene

RECOVERY

102 %
101 %
101 %

LIMITS

76-114
88-110
86-115

STATUS

OK
OK
OK

J - Indicates compound concentration found below MDL.

U - Indicates compound analyzed for but not detected.

B - Indicates compound found in associated blank.

W - Result exceeds specific ground water quality criteria.*

* Flags are based on Specific Ground Water Quality Criteria from New Jersey Register dated February 1, 1993.

866300050

ACCREDITED LABORATORIES, INC.
SMA ORGANIC ANALYSIS DATA

CASE NUMBER 2616
SAMPLE NUMBER 95116616
DATA FILE YF1694
CLIENT NAME CCI
FIELD ID NNEA

MATRIX Aqueous
DILUTION FACTOR 5
DATE EXTRACTED 05/15/96
DATE ANALYZED 05/25/96
ANALYZED BY PAUL

CAS #	COMPOUND	UG/L	MOL	CAS #	COMPOUND	UG/L	MOL
103952	Phenol	U	50	95954	2,4,5-Trichlorophenol	U	250
95578	2-Chlorophenol	U	50	51285	2,4-Dinitrophenol	U	250
95487	2-Methylphenol	U	50	103027	4-Nitrophenol	U	250
103394	3,4-Methylphenol	U	50	534521	4,6-Dinitro-2-methylphenol	U	250
88755	2-Nitrophenol	600	50	87865	Pentachlorophenol	U	250
105679	2,4-Dimethylphenol	U	50	121142	2,4-Dinitrotoluene	U	50
120832	2,4-Dichlorophenol	U	50	94462	Diethylphthalate	U	50
101444	bis(2-Chloroethyl) Ether	U	50	7005723	4-Chlorophenyl-phenylether	U	50
641731	1,3-Dichlorobenzene	U	50	86737	Fluorene	U	50
106467	1,4-Dichlorobenzene	U	50	100016	4-Nitroaniline	U	250
100516	Benzyl Alcohol	U	50	86306	N-Nitrosodiphenylamine	U	50
45591	1,2-Dichlorobenzene	U	50	101553	4-Bromophenyl-phenylether	U	50
108541	bis(2-Chloroisopropyl) Ether	U	50	113741	Hexachlorobenzene	U	50
611647	N-Nitroso-Di-n-propylamine	U	50	25918	Phenanthrene	U	50
67701	Hexachloroethane	U	50	120127	Anthracene	U	50
99953	Nitrobenzene	U	50	84742	Di-n-Butylphthalate	U	50
10091	Isophorone	U	50	206440	Fluoranthene	U	50
95950	Benzoic Acid	U	250	129000	Pyrene	U	50
111911	bis(2-Chloroethoxy)Methane	U	50	85687	Butylbenzylphthalate	U	50
120821	1,2,4-Trichlorobenzene	U	50	91941	3,3'-Dichlorobenzidine	U	100
41203	Naphthalene	U	50	76553	Benz(a)Anthracene	U	50
106473	4-Chloroaniline	U	50	113917	Bis(2-Ethylhexyl)Phthalate	U	50
67683	Hexachlorobutadiene	U	50	218019	Chrysene	U	50
41576	2-Methylnaphthalene	U	50	117840	Di-n-octyl phthalate	U	50
77474	Hexachlorocyclopentadiene	U	50	205992	Benzo(b)fluoranthene	U	50
41587	2-Chloronaphthalene	U	50	207089	Benzo(k)fluoranthene	U	50
88744	2-Nitroaniline	U	250	50328	Benzo(a)Pyrene	U	50
101113	Dimethyl Phthalate	U	50	194395	Indeno(1,2,3-cd)Pyrene	U	50
108968	Acenaphthylene	U	50	53703	Dibenz(a,h)Anthracene	U	50
99092	3-Nitroaniline	U	250	191242	Benzo(g,h,i)Perylene	U	50
23329	Acenaphthene	U	50	62759	N-Nitrosodimethylamine	U	50
102649	Dibenzofuran	U	50	237329	2,4-Dinitrochlorobenzene	U	2500
606202	2,6-Dinitrotoluene	U	50	229715	2,5-Dinitrophenol	U	2500
59587	4-Chloro-3-methylphenol	U	50	38891	2,4,6-Trinitrophenol	U	2500
33362	2,4,6-Trichlorophenol	U	50				

SUBSTRATE COMPARISONS

Nitrobenzene-05	55 %
2-Fluorobiphenyl	70 %
Terphenyl-d14	682 %
Phenol-d5	43 %
2-Fluorophenol	31 %
2,4,6-Tribromophenol	16 %

RECOVERY

55 %
70 %
682 %
43 %
31 %
16 %

LIMITS

35-114
45-116
33-141
10- 94
21-100
10-123

STATUS

OK
OK
OUT
OK
OK
OK

U - Indicates compound concentration found below MDL.

B - Indicates compound analyzed for but not detected.

B - Indicates compound found in associated blank.

W - Result exceeds specific ground water quality criteria.*

* Flags are based on Specific Ground Water Quality Criteria from New Jersey Register dated February 1, 1993.

** 3-Methylphenol and 4-Methylphenol can not be separated by the method applied

866300051

INDUSTRIAL CORROSION MANAGEMENT, Inc.

1152 Route 10

Randolph, NJ 07869

201-584-0330

TOBER 11, 1995

Certified for: NJ, PA, DE, CT, NY(DOH)

NJ #14116 NY #11376

US EPA CLP Lab

ANALYTICAL DATA REPORT PACKAGE

Client:

CHEMICAL COMPOUNDS, INC.

Sample Source:

Waste water

Sampled By:

Customer

SAMPLE ID:

MATRIX

LAB
NUMBER

DATE &
TIME
COLLECTED

AT
LAB
DATE

NPD ML's

Aqueous

220698

09/21/95 08:30

09/22/95

Supervisor/Manager Signature:

Richard S. Levine (inc)
Richard S. Levine

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INDUSTRIAL CORROSION MANAGEMENT, INC.
1152 Route 10
Randolph, NJ 07869
201-584-0330
OCTOBER 4, 1995

Certified for: NJ, PA, DE, CT, NY(DOH)
NJ #14116 NY #11376
US EPA CLP Lab

PRIORITY POLLUTANT ACID FRACTION ANALYSIS BY GC/MS

Lab Number: 220698 Data File: >I7063
Client: CHEMICAL COMPOUNDS, INC.
Sample source: Waste water
Sample ID: NPD ML's
Sample date: 09/21/95 Extracted Date: 09/26/95
Sampled by: Customer Analysis Date: 09/26/95 Column: 30m SPB-5
At lab date: 09/22/95 Dilution Factor: 10
Matrix: WATER

Init Sample vol= 50ml Final volume= 10ml

Conc. in Sample = ((Conc. on Quant Report/Initial Volume)*Final Volume)*1000

Parameter	Result ug/l	Method Blank ug/l	Minimum Detection Limit ug/l
2-Chlorophenol	U	U	200
2-Nitrophenol	U	U	200
Phenol	U	U	360
2,4-Dimethylphenol	U	U	200
2,4-Dichlorophenol	U	U	200
2,4,6-Trichlorophenol	U	U	200
Pentachlorophenol	U	U	200
2,4-Dinitrophenol	U	U	720
4,6-Dinitro-2-methylphenol	U	U	200
4-Nitrophenol	U	U	200
4-Chloro-3-methylphenol	U	U	200

ug/l = micrograms/liter or ppb

J: Indicates a compound was analyzed for but not detected at the MDL.
J: Indicates an estimated value. It is utilized when a reported value meets the identification criteria but the result is less than the specified detection limit but greater than zero.

B: Indicates that the analyte was found in the blank as well as the sample. It indicates possible/probable blank contamination.

ND: Not Determined.

IND: Indeterminable

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MEG

INDUSTRIAL CORROSION MANAGEMENT, INC.
1152 Route 10
Randolph, NJ 07869
201-584-0330
OCTOBER 4, 1995

Certified for: NJ, PA, DE, CT, NY(DOH)
NJ #14116 NY #11376
US EPA CLP Lab

PRIORITY POLLUTANT BASE/NEUTRAL ANALYSIS BY GC/MS

Lab Number: 220698 Data File: >I7063
Client: CHEMICAL COMPOUNDS, INC.
Sample source: Waste water
Sample ID: NPD ML's
Sample date: 09/21/95 Extracted Date: 09/26/95
Sampled by: Customer Analysis Date: 09/26/95 Column: 30m SPB-5
At lab date: 09/22/95 Dilution Factor: 10
Matrix: WATER

Init Sample vol= 50ml Final volume= 10ml

Conc. in Sample = ((Conc. on Quant Report/Initial Volume)*Final Volume)*1000

Parameter	Result ug/l	Method Blank ug/l	Minimum Detection Limit ug/l
N-Nitrosodimethylamine	U	U	200
bis(2-Chloroethyl) ether	U	U	200
1,3-Dichlorobenzene	U	U	480
1,4-Dichlorobenzene	U	U	460
1,2-Dichlorobenzene	U	U	480
bis(2-Chloroisopropyl) ether	U	U	240
N-Nitroso-di-n-propylamine	U	U	360
Hexachloroethane	U	U	580
Nitrobenzene	U	U	200
Isophorone	U	U	200
bis(2-Chloroethoxy) methane	U	U	200
1,2,4-Trichlorobenzene	U	U	460
Naphthalene	U	U	400
Hexachlorobutadiene	U	U	200
achlorocyclopentadiene	U	U	300
iforonaphthalene	U	U	400
Dimethyl phthalate	U	U	920
Acenaphthylene	U	U	300
2,6-Dinitrotoluene	U	U	200
Acenaphthene	U	U	380
2,4-Dinitrotoluene	U	U	200
Diethyl phthalate	U	U	460
4-Chlorophenyl phenyl ether	U	U	400
Fluorene	U	U	340
N-Nitrosodiphenylamine	U	U	200
1,2-Diphenylhydrazine (Azobenzene)	U	U	200
4-Bromophenyl phenyl ether	U	U	380
Hexachlorobenzene	U	U	380
Phenanthrene	U	U	180
Anthracene	U	U	160
Di-n-butylphthalate	U	U	500
Fluoranthene	U	U	120
Benzidine	U	U	200
Pyrene	U	U	100
Butyl benzylphthalate	U	U	240
3,3'-Dichlorobenzidine	U	U	200
Benzo(a)anthracene	U	U	100
Chrysene	U	U	100
bis(2-Ethylhexyl)phthalate	U	U	600
Di-n-octylphthalate	U	U	200
Benzo(b)fluoranthene	U	U	140

ug/l = micrograms/liter or ppb

U: Indicates a compound was analyzed for but not detected at the MDL.
J: Indicates an estimated value. It is utilized when a reported value meets the identification criteria but the result is less than the specified detection limit but greater than zero.

B: Indicates that the analyte was found in the blank as well as the sample. It indicates possible/probable blank contamination.

ND: Not Determined.

IND: Indeterminable

INDUSTRIAL CORROSION MANAGEMENT, INC.
1152 Route 10
Randolph, NJ 07869
201-584-0330
OCTOBER 4, 1995

Certified for: NJ, PA, DE, CT, NY(DOH)
NJ #14116 NY #11376
US EPA CLP Lab

PRIORITY POLLUTANT BASE/NEUTRAL ANALYSIS BY GC/MS
(Continued)

Additional Base/Neutral Targeted Compounds

Lab Number: 220698
Client: CHEMICAL COMPOUNDS, INC.
Sample source: Waste water
Sample ID: NPD ML's
Sample date: 09/21/95
Sampled by: Customer
At lab date: 09/22/95
Matrix: WATER

Data File: >I7063

Extracted Date: 09/26/95
Analysis Date: 09/26/95
Column: 30m SPB-5
Dilution Factor: 10

Init Sample vol= 50ml Final volume= 10ml

Conc. in Sample = ((Conc. on Quant Report/Initial Volume)*Final Volume)*1000

Parameter	Result ug/l	Method Blank ug/l	Minimum Detection Limit ug/l
Benzo(k)fluoranthene	U	U	140
Benzo(a)pyrene	U	U	100
Indeno(1,2,3-cd)pyrene	U	U	220
Dibenz(a,h)anthracene	U	U	100
Benzo(g,h,i)perylene	U	U	100

ug/l = micrograms/liter or ppb

U: Indicates a compound was analyzed for but not detected at the MDL.

J: Indicates an estimated value. It is utilized when a reported value meets the identification criteria but the result is less than the specified detection limit but greater than zero.

B: Indicates that the analyte was found in the blank as well as the sample. It indicates possible/probable blank contamination.

ND: Not Determined.

IND: Indeterminable

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866300055



Integrated Analytical Laboratories, Inc.

273 Franklin Road
Randolph, N.J. 07869

201 361-4252
Fax: 201 989-5288

ANALYTICAL DATA REPORT

for
Chemical Compounds Inc.
29-75 Riverside Ave.
Newark, NJ 07101

Project Name: INTERNAL MONITORING
Lab Case Number: 10950 - 2640

MDL - METHOD DETECTION LIMIT

< = LESS THAN THE MDL

VOLATILES

Lab ID: 2640-01-
Client ID: 001
Matrix/Units: Aqueous - µg/L
Percent Moisture: 100

Date Sampled: 11/17/95
Time Sampled: 11:30
Date Analyzed: 11/28/95

Compound	Conc.	MDL	Compound	Conc.	MDL
Chloromethane	< 50	50	Bromodichloromethane	< 50	50
Vinyl chloride	< 50	50	2-Chloroethylvinyl ether	< 50	50
Bromomethane	< 50	50	cis-1,3-Dichloropropene	< 50	50
Chloroethane	< 50	50	Toluene	< 50	50
Trichlorofluoromethane	< 50	50	trans-1,3-Dichloropropene	< 50	50
1,1-Dichloroethane	< 50	50	1,1,2-Trichloroethane	< 50	50
Methylene chloride	< 100	100	Tetrachloroethane	< 50	50
trans-1,2-Dichloroethane	< 50	50	Dibromochloromethane	< 50	50
1,1-Dichloroethane	< 50	50	Chlorobenzene *	2810	50
Chloroform	< 50	50	Ethylbenzene	< 50	50
1,1,1-Trichloroethane	< 50	50	Xylenes, total	*49100	2000
Carbon tetrachloride	< 50	50	Bromoform	< 50	50
1,2-Dichloroethane	< 50	50	1,1,2,2-Tetrachloroethane	< 50	50
Benzene	< 50	50	1,3-Dichlorobenzene	< 50	50
Trichloroethene	< 50	50	1,4-Dichlorobenzene	< 50	50
1,2-Dichloropropene	< 50	50	1,2-Dichlorobenzene	169	50

*Result from diluted Sample Analysis.

Continued on next page.

YELLOW #2 "PURE"



Integrated Analytical Laboratories, Inc.

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Randolph, N.J. 07869

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Fax: 201 989-5288

ANALYTICAL DATA REPORT

for
Chemical Compounds Inc.
29-75 Riverside Ave.
Newark, NJ 07101

Project Name: INTERNAL MONITORING
Lab Case Number: 10950 - 2640

MDL = METHOD DETECTION LIMIT

< = LESS THAN THE MDL

SEMIVOLATILES (BNA)

Lab ID: 2640-01 -

Client ID: 001

Matrix/Units: Aqueous - µg/L

Percent Moisture: 100

Date Sampled: 11/17/95

Time Sampled: 11:30

Date Analyzed: 11/28/95

Compound	Conc.	MDL	Compound	Conc.	MDL
3-Nitroaniline	< 100	100	Carbazole	< 100	100
Acenaphthene	< 100	100	Di-n-butylphthalate	< 100	100
2,4-Dinitrophenol	< 100	100	Fluoranthene	< 100	100
4-Nitrophenol	< 100	100	Benazidine	< 100	100
2,4-Dinitrotoluene	< 100	100	Pyrene	< 100	100
Dibenzofuran	< 100	100	3,3'-Dimethylbenzidine	< 100	100
Diethylphthalate	< 100	100	Butylbenzylphthalate	< 100	100
Fluorene	< 100	100	3,3'-Dichlorobenzidine	< 100	100
4-Chlorophenyl-phenylether	< 100	100	Benzo[a]anthracene	< 100	100
4-Nitroaniline	< 100	100	Chrysene	< 100	100
4,6-Dinitro-2-methylphenol	< 100	100	bis(2-Ethylhexyl)phthalate	< 100	100
N-Nitrosodiphenylamine	< 100	100	Di-n-octylphthalate	< 100	100
1,2-Diphenylhydrazine/Azobenzene	< 100	100	Benzo[b]fluoranthene	< 100	100
4-Bromophenyl-phenylether	< 100	100	Benzo[k]fluoranthene	< 100	100
Hexachlorobenzene	< 100	100	Benzo[a]pyrene	< 100	100
Pentachlorophenol	< 100	100	Indeno[1,2,3-cd]pyrene	< 100	100
Phenanthrene	< 100	100	Dibenz[a,h]anthracene	< 100	100
Anthracene	< 100	100	Benzo[g,h,i]perylene	< 100	100

YELLOW #2 "PURE"



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ANALYTICAL DATA REPORT

for

Chemical Compounds Inc.
29-75 Riverside Ave.
Newark, NJ 07101

Project Name: INTERNAL MONITORING

Lab Case Number: 10950 - 2640

MDL = METHOD DETECTION LIMIT

< = LESS THAN THE MDL

SEMIVOLATILES (BNA)

Lab ID: 2640-01

Client ID: 001

Matrix/Units: Aqueous - µg/L

Percent Moisture: 100

Date Sampled: 11/17/95

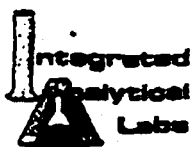
Time Sampled: 11:30

Date Analyzed: 11/28/95

Compound	Conc.	MDL	Compound	Conc.	MDL
N-Nitrosodimethylamine	< 100	100	bis(2-Chloroethoxy)methane	< 100	100
Phenol	< 100	100	Benzoic acid	< 500	500
Aniline	< 100	100	2,4-Dimethylaniline	< 100	100
bis(2-Chloroethyl)ether	< 100	100	2,4-Dichlorophenol	< 100	100
2-Chlorophenol	496	100	1,2,4-Trichlorobenzene	< 100	100
1,3-Dichlorobenzene	< 100	100	Naphthalene	< 100	100
1,4-Dichlorobenzene	< 100	100	4-Chloroaniline	< 100	100
Benzyl alcohol	< 100	100	Hexachlorobutadiene	< 100	100
1,2-Dichlorobenzene	< 100	100	4-Chloro-3-methylphenol	< 100	100
2-Methylphenol	< 100	100	2-Methylnaphthalene	< 100	100
bis(2-chloroisopropyl)ether	< 100	100	Hexachlorocyclopentadiene	< 100	100
4-Methylphenol	< 100	100	2,4,6-Trichlorophenol	< 100	100
N-Nitroso-di-n-propylamine	< 100	100	2,4,5-Trichlorophenol	< 100	100
2-Aminotoluene + 4-Aminotoluene	< 100	100	2-Chloronaphthalene	< 100	100
Hexachloroethane	< 100	100	2-Nitroaniline	5510	100
Nitrobenzene	259	100	Dimethylphthalate	< 100	100
Isophorone	< 100	100	2,6-Dinitrotoluene	< 100	100
2-Nitrophenol	3380	100	Acenaphthylene	< 100	100
2,4-Dimethylphenol	< 100	100			

Continued on next page.

Yellow #2 "PURE"



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ANALYTICAL DATA REPORT

for

Chemical Compounds Inc.
29-75 Riverside Ave.
Newark, NJ 07101

Project Name: PVSC MONITORING
Lab Case Number : 10950 - 2639

YELLOW #4

MDL = METHOD DETECTION LIMIT

< = LESS THAN THE MDL

VOLATILES Method 624

Lab ID : 2639-001

Client ID : 001

Matrix/Units : Aqueous - µg/L

Percent Moisture: 100

Date Sampled : 11/17/95

Time Sampled : 11:30

Date Analyzed : 11/28/95

Compound	Conc.	Q	MDL	Compound	Conc.	Q	MDL
Chloromethane	< 50		50	Bromodichloromethane	< 50		50
Vinyl Chloride	< 50		50	2-Chloroethyl Vinyl Ether	< 50		50
Bromomethane	< 50		50	cis-1,3-Dichloropropene	< 50		50
Chloroethane	< 50		50	Toluene	< 50		50
Trichlorofluoromethane	< 50		50	trans-1,3-Dichloropropene	< 50		50
1,1-Dichloroethane	< 50		50	1,1,2-Trichloroethane	< 50		50
Methylene Chloride	< 100		100	Tetrachloroethane	< 50		50
trans-1,2-Dichloroethane	< 50		50	Dibromochloromethane	< 50		50
1,1-Dichloroethane	< 50		50	Chlorobenzene	< 50		50
Chloroform	53.1	26	50	Ethylbenzene	< 50		50
1,1,1-Trichloroethane	< 50	11	50	Total Xylenes	260		50
Carbon Tetrachloride	< 50		50	Bromoform	< 50		50
1,2-Dichloroethane -	7200*		200	1,1,2,2-Tetrachloroethane	< 50		50
Benzene	< 50		50	1,3-Dichlorobenzene	< 50		50
Trichloroethane	< 50		50	1,4-Dichlorobenzene	< 50		50
1,2-Dichloropropane	< 50		50	1,2-Dichlorobenzene	< 50		50

* Results from diluted sample analysis.

TOTAL CYANIDE Method 335.2

Lab ID : 2639-001

Client ID : 001

Matrix/Units : Aqueous - mg/L

Percent Moisture: 100

Date Sampled : 11/17/95

Time Sampled : 11:30

Date Analyzed : 11/28/95

Result

MDL

< 0.05

0.05

All NJDEP protocol were followed during analyses. These data have been reviewed and accepted by:

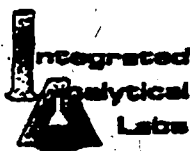
Michael H. Laffin
Michael H. Laffin, Ph.D.
Laboratory Director

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New Jersey Certified Lab # 14751

New York Certified Lab # 11402

866300059

**Integrated Analytical Laboratories, Inc.**273 Franklin Road
Randolph, N.J. 07869201 361-4252
Fax: 201 989-5288**ANALYTICAL DATA REPORT**

for

Chemical Compounds, Inc.
29-75 Riverside Ave.
Newark, NJ 07101

Project Name : PVSC - MONITORING

Lab Case Number : 10959 - 2638

HC Yellow #4

MDL - METHOD DETECTION LIMIT

< - LESS THAN THE MDL

SEMIVOLATILES - ACIDS

Method 625

Lab ID : 2638-001

Client ID : 001

Matrix/Units : Aqueous - µg/L

Percent Moisture: 100 -

Date Sampled : 11/17/95

Time Sampled : 11:30

Date Analyzed : 11/28/95

Compound	Result	Q	MDL
Phenol	< 100		100
2-Chlorophenol	< 100		100
2-Methylphenol	< 100		100
4-Methylphenol	< 100		100
2-Nitrophenol	< 100		100
2,4-Dimethylphenol	< 100		100
Benzoic acid	< 500		500
2,4-Dichlorophenol	< 100		100
4-Chloro-3-methylphenol	< 100		100
2,4,6-Trichlorophenol	< 100		100
2,4,5-Trichlorophenol	< 100		100
2,4-Dinitrophenol	< 100		100
4-Nitrophenol	< 100		100
4,6-Dinitro-2-methylphenol	< 100		100
Pentachlorophenol	< 100		100

METALS

EPA Series 200

Lab ID : 2638-001

Client ID : 001

Matrix/Units : Aqueous - mg/L

Percent Moisture: 100

Date Sampled : 11/17/95

Time Sampled : 11:30

Date Analyzed : 11/22/95

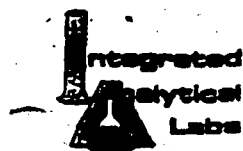
Compound	Result	Q	MDL
Lead	0.15		0.04
Zinc	0.53		0.02

Q = Qualifier

All NJDEP protocol were followed during analyses. These data have been reviewed and accepted by:

Michael H. Leftin, Ph.D.
Laboratory Director

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Integrated Analytical Laboratories, Inc.

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ANALYTICAL DATA REPORT

for

Chemical Compounds, Inc.
29-75 Riverside Ave.
Newark, NJ 07101

Project Name : PVSC - MONITORING
Lab Case Number : 10950 - 2638

HC Yellow #4

MDL - METHOD DETECTION LIMIT

< = LESS THAN THE MDL

SEMIVOLATILES - BASE NEUTRALS

Method 625

Lab ID : 2638-001
Client ID : 001
Matrix/Units : Aqueous - µg/L
Percent Moisture: 100

Date Sampled : 11/17/95
Time Sampled : 11:30
Date Analyzed : 11/28/95

Compound	Conc.	Q	MDL	Compound	Conc.	Q	MDL
N-Nitrosodimethylamine	< 100		100	Diethylphthalate	< 100		100
Aniline	< 100		100	Fluorene	< 100		100
bis(2-Chloroethyl)ether *	*47600		400	4-Chlorophenyl-phenylether	< 100		100
1,3-Dichlorobenzene	< 100		100	4-Nitroaniline	< 100		100
1,4-Dichlorobenzene	< 100		100	N-Nitrosodiphenylamine	< 100		100
Benzyl alcohol	< 100		100	1,2-Diphenylhydrazine/Azobenzene	< 100		100
1,2-Dichlorobenzene	< 100		100	4-Bromophenyl-phenylether	< 100		100
bis(2-chloroisopropyl)ether	< 100		100	Hexachlorobenzene	< 100		100
N-Nitroso-di-n-propylamine	< 100		100	Phenanthrene	< 100		100
Hexachloroethane	< 100		100	Anthracene	< 100		100
Nitrobenzene	< 100		100	Carbazole	< 100		100
Isophorone	< 100		100	Di-n-butylphthalate	< 100		100
bis(2-Chloroethoxy)methane	< 100		100	Fluoranthene	< 100		100
1,2,4-Trichlorobenzene	< 100		100	Benzidine	< 100		100
Naphthalene	< 100		100	Pyrene	< 100		100
4-Chloroaniline	< 100		100	3,3'-Dimethylbenzidine	< 100		100
Hexachlorobutadiene	< 100		100	Butylbenzylphthalate	< 100		100
2-Methylnaphthalene	< 100		100	3,3'-Dichlorobenzidine	< 100		100
Hexachlorocyclopentadiene	< 100		100	Benzo[a]anthracene	< 100		100
2-Chloronaphthalene	< 100		100	Chrysene	< 100		100
2-Nitroaniline	< 100		100	bis(2-Ethylhexyl)phthalate	107		100
Dimethylphthalate	< 100		100	Di-n-octylphthalate	< 100		100
2,6-Dinitrotoluene	< 100		100	Benzo[b]fluoranthene	< 100		100
Acenaphthylene	< 100		100	Benzo[k]fluoranthene	< 100		100
3-Nitroaniline	< 100		100	Benzo[a]pyrene	< 100		100
Acenaphthene	< 100		100	Indeno[1,2,3-cd]pyrene	< 100		100
2,4-Dinitrotoluene	< 100		100	Dibenz[a,h]anthracene	< 100		100
Dibenzofuran	< 100		100	Benzo[g,h,i]perylene	< 100		100

Q - Qualifier

* - Result from diluted analysis.

Continued on the next page.

866300062



Integrated Analytical Laboratories, Inc.

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Randolph, N.J. 07869

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Fax: 201 989-5288

ANALYTICAL DATA REPORT

for

Chemical Compounds Inc.
29-75 Riverside Ave.
Newark, NJ 07101

Project Name: SELF-MONITORING
Lab Case Number: 10950 - 1719

DNHA = #13

MDL = METHOD DETECTION LIMIT

< = LESS THAN THE MDL

VOLATILES

Lab ID: 1719-002

Client ID: 002

Matrix/Units: Aqueous - µg/L

Date Sampled: 8/9/95

Time Sampled: 11:00

Date Analyzed: 8/15/95

Compound	Conc.	MDL	Compound	Conc.	MDL
Chloromethane	< 100	100	Bromodichloromethane	< 100	100
Vinyl chloride	< 100	100	2-Chloroethylvinyl ether	< 100	100
Bromomethane	< 100	100	cis-1,3-Dichloropropene	< 100	100
Chloroethane	< 100	100	Toluene	< 100	100
Trichlorofluoromethane	< 100	100	trans-1,3-Dichloropropene	< 100	100
1,1-Dichloroethane	< 100	100	1,1,2-Trichloroethane	< 100	100
Methylene chloride	< 200	200	Tetrachloroethene	< 100	100
trans-1,2-Dichloroethene	< 100	100	Dibromochloromethane	< 100	100
1,1-Dichloroethane	< 100	100	Chlorobenzene	< 100	100
Chloroform	< 100	100	Ethylbenzene	< 100	100
1,1,1-Trichloroethane	< 100	100	Xylenes, total	< 100	100
Carbon tetrachloride	< 100	100	Bromoform	< 100	100
1,2-Dichloroethane	< 100	100	1,1,2,2-Tetrachloroethane	< 100	100
Benzene	< 100	100	1,3-Dichlorobenzene	< 100	100
Trichloroethene	< 100	100	1,4-Dichlorobenzene	< 100	100
1,2-Dichloropropane	< 100	100	1,2-Dichlorobenzene	< 100	100

TENTATIVELY IDENTIFIED COMPOUNDS

Lab ID: 1719-002

Client ID: 002

Matrix/Units: Aqueous - µg/L

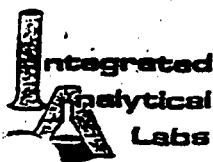
Date Sampled: 8/9/95

Time Sampled: 11:00

Date Analyzed: 8/15/95

CAS#	COMPOUND	ESTIMATED CONCENTRATION	RETENTION TIME
	Unknown	146000	5.82

Continued on next page.



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866300063

ANALYTICAL DATA REPORT

for

Chemical Compounds Inc.
29-75 Riverside Ave.
Newark, NJ 07101

Project Name: SELF-MONITORING

Lab Case Number: 10950 - 1719

DNHA- #13

MDL = METHOD DETECTION LIMIT

< = LESS THAN THE MDL

BASE NEUTRALS ACIDS

Lab ID: 1719-002

Client ID: 002

Matrix/Units: Aqueous - µg/L

Date Sampled : 8/9/95

Time Sampled : 11:00

Date Analyzed : 8/15/95

Compound	Conc.	MDL Compound	Conc.	MDL
N-Nitrosodimethylamine	< 160.0	160.0 bis(2-Chloroethoxy)methane	< 160.0	160.0
Phenol	< 160.0	160.0 Benzoic acid	< 800.0	800.0
Aniline	< 160.0	160.0 2,4-Dimethylaniline	< 160.0	160.0
bis(2-Chloroethyl)ether	< 160.0	160.0 2,4-Dichlorophenol	< 160.0	160.0
2-Chlorophenol	< 160.0	160.0 1,2,4-Trichlorobenzene	< 160.0	160.0
1,3-Dichlorobenzene	< 160.0	160.0 Naphthalene	< 160.0	160.0
1,4-Dichlorobenzene	< 160.0	160.0 4-Chloroaniline	< 160.0	160.0
Benzyl alcohol	< 160.0	160.0 Hexachlorobutadiene	< 160.0	160.0
1,2-Dichlorobenzene	< 160.0	160.0 4-Chloro-3-methylphenol	< 160.0	160.0
2-Methylphenol	< 160.0	160.0 2-Methylnaphthalene	< 160.0	160.0
bis(2-chloroisopropyl)ether	< 160.0	160.0 Hexachlorocyclopentadiene	< 160.0	160.0
4-Methylphenol	< 160.0	160.0 2,4,6-Trichlorophenol	< 160.0	160.0
N-Nitroso-di-n-propylamine	< 160.0	160.0 2,4,5-Trichlorophenol	< 160.0	160.0
2-Aminotoluene + 4-Aminotoluene	< 160.0	160.0 2-Chloronaphthalene	< 160.0	160.0
Hexachloroethane	< 160.0	160.0 2-Nitroaniline	< 160.0	160.0
Nitrobenzene	< 160.0	160.0 Dimethylphthalate	< 160.0	160.0
Isophorone	< 160.0	160.0 2,6-Dinitrotoluene	< 160.0	160.0
2-Nitrophenol	< 160.0	160.0 Acenaphthylene	< 160.0	160.0
2,4-Dimethylphenol	< 160.0	160.0		

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866300064

ANALYTICAL DATA REPORT

for

Chemical Compounds Inc.
29-75 Riverside Ave.
Newark, NJ 07101

DNHA #13

Project Name: SELF-MONITORING

Lab Case Number: 10950 - 1719

MDL = METHOD DETECTION LIMIT

< = LESS THAN THE MDL

BASE NEUTRALS ACIDS

Lab ID: 1719-002

Client ID: 002

Matrix/Units: Aqueous - µg/L

Date Sampled : 8/9/95

Time Sampled : 11:00

Date Analyzed : 8/15/95

Compound	Conc.	MDL	Compound	Conc.	MDL
3-Nitroaniline	< 160.0	160.0	Carbazole	< 160.0	160.0
Acenaphthene	< 160.0	160.0	Di-n-butylphthalate	< 160.0	160.0
2,4-Dinitrophenol	12100	160.0	Fluoranthene	< 160.0	160.0
4-Nitrophenol	< 160.0	160.0	Benzidine	< 160.0	160.0
2,4-Dinitrotoluene	< 160.0	160.0	Pyrene	< 160.0	160.0
Dibenzofuran	< 160.0	160.0	3,3'-Dimethylbenzidine	< 160.0	160.0
Diethylphthalate	< 160.0	160.0	Butylbenzylphthalate	< 160.0	160.0
Fluorene	< 160.0	160.0	3,3'-Dichlorobenzidine	< 160.0	160.0
4-Chlorophenyl-phenylether	< 160.0	160.0	Benzo[a]anthracene	< 160.0	160.0
4-Nitroaniline	< 160.0	160.0	Chrysene	< 160.0	160.0
4,6-Dinitro-2-methylphenol	< 160.0	160.0	bis(2-Ethylhexyl)phthalate	< 160.0	160.0
N-Nitrosodiphenylamine	< 160.0	160.0	Di-n-octylphthalate	< 160.0	160.0
1,2-Diphenylhydrazine/Azobenzene	< 160.0	160.0	Benzo[b]fluoranthene	< 160.0	160.0
4-Bromophenyl-phenylether	< 160.0	160.0	Benzo[k]fluoranthene	< 160.0	160.0
Hexachlorobenzene	< 160.0	160.0	Benzo[a]pyrene	< 160.0	160.0
Pentachlorophenol	< 160.0	160.0	Indeno[1,2,3-cd]pyrene	< 160.0	160.0
Phenanthrene	< 160.0	160.0	Dibenz[a,h]anthracene	< 160.0	160.0
Anthracene	< 160.0	160.0	Benzo[g,h,i]perylene	< 160.0	160.0

All NJDEP protocol were followed during analyses. These data have been reviewed and accepted by:

Michael H. Leftin, Ph.D.
Laboratory Director

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Integrated Analytical Laboratories, Inc.

273 Franklin Road
Randolph, N.J. 07869

201 361-4252
Fax: 201 989-5288

866300065

ANALYTICAL DATA REPORT

for
Chemical Compounds Inc.
29-75 Riverside Ave.
Newark, NJ 07101

Project Name: SELF-MONITORING

Lab Case Number: 10950 - 1719

YELLOW #5 Ba#13

MDL = METHOD DETECTION LIMIT

< = LESS THAN THE MDL

VOLATILES

Lab ID: 1719-001

Client ID: 001

Matrix/Units: Aqueous - µg/L

Date Sampled: 8/9/95

Time Sampled: 11:00

Date Analyzed: 8/15/95

Compound	Conc.	MDL	Compound	Conc.	MDL
Chloromethane	< 100	100	Bromodichloromethane	< 100	100
Vinyl chloride	< 100	100	2-Chloroethylvinyl ether	< 100	100
Bromomethane	< 100	100	cis-1,3-Dichloropropene	< 100	100
Chloroethane	< 100	100	Toluene	< 100	100
Trichlorofluoromethane	< 100	100	trans-1,3-Dichloropropene	< 100	100
1,1-Dichloroethene	< 100	100	1,1,2-Trichloroethane	< 100	100
Methylene chloride	< 200	200	Tetrachloroethene	< 100	100
trans-1,2-Dichloroethene	< 100	100	Dibromochloromethane	< 100	100
1,1-Dichloroethane	< 100	100	Chlorobenzene	< 100	100
Chloroform	< 100	100	Ethylbenzene	< 100	100
1,1,1-Trichloroethane	< 100	100	Xylenes, total	< 100	100
Carbon tetrachloride	< 100	100	Bromoform	< 100	100
1,2-Dichloroethane	< 100	100	1,1,2,2-Tetrachloroethane	< 100	100
Benzene	< 100	100	1,3-Dichlorobenzene	< 100	100
Trichloroethene	< 100	100	1,4-Dichlorobenzene	< 100	100
1,2-Dichloropropane	< 100	100	1,2-Dichlorobenzene	< 100	100

TENTATIVELY IDENTIFIED COMPOUNDS

Lab ID: 1719-001

Client ID: 001

Matrix/Units: Aqueous - µg/L

Date Sampled: 8/9/95

Time Sampled: 11:00

Date Analyzed: 8/15/95

CAS#	COMPOUND	ESTIMATED CONCENTRATION	RETENTION TIME
	Unknown	158000	5.76

Continued on next page.



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ANALYTICAL DATA REPORT

for
Chemical Compounds Inc.
29-75 Riverside Ave.
Newark, NJ 07101

Yellow 5, #13

Project Name: SELF-MONITORING
Lab Case Number: 10950 - 1719

MDL = METHOD DETECTION LIMIT

< = LESS THAN THE MDL

BASE NEUTRALS ACIDS

Lab ID: 1719-001

Client ID: 001

Matrix/Units: Aqueous - µg/L

Date Sampled: 8/9/95

Time Sampled: 11:00

Date Analyzed: 8/15/95

Compound	Conc.	MDL	Compound	Conc.	MDL
N-Nitrosodimethylamine	< 40.0	40.0	bis(2-Chloroethoxy)methane	< 40.0	40.0
Phenol	< 40.0	40.0	Benzoic acid	< 200.0	200.0
Aniline	< 40.0	40.0	2,4-Dimethylaniline	< 40.0	40.0
bis(2-Chloroethyl)ether	< 40.0	40.0	2,4-Dichlorophenol	< 40.0	40.0
2-Chlorophenol	< 40.0	40.0	1,2,4-Trichlorobenzene	44.2	40.0
1,3-Dichlorobenzene	< 40.0	40.0	Naphthalene	< 40.0	40.0
1,4-Dichlorobenzene	< 40.0	40.0	4-Chloroaniline	442	40.0
Benzyl alcohol	< 40.0	40.0	Hexachlorobutadiene	< 40.0	40.0
1,2-Dichlorobenzene	< 40.0	40.0	4-Chloro-3-methylphenol	< 40.0	40.0
2-Methylphenol	< 40.0	40.0	2-Methylnaphthalene	< 40.0	40.0
bis(2-chloroisopropyl)ether	< 40.0	40.0	Hexachlorocyclopentadiene	< 40.0	40.0
4-Methylphenol	< 40.0	40.0	2,4,6-Trichlorophenol	< 40.0	40.0
N-Nitroso-di-n-propylamine	< 40.0	40.0	2,4,5-Trichlorophenol	< 40.0	40.0
2-Aminotoluene + 4-Aminotoluene	< 40.0	40.0	2-Chloronaphthalene	< 40.0	40.0
Hexachloroethane	< 40.0	40.0	2-Nitroaniline	< 40.0	40.0
Nitrobenzene	< 40.0	40.0	Dimethylphthalate	< 40.0	40.0
Isophorone	< 40.0	40.0	2,6-Dinitrotoluene	< 40.0	40.0
2-Nitrophenol	< 40.0	40.0	Acenaphthylene	< 40.0	40.0
2,4-Dimethylphenol	< 40.0	40.0			

Continued on next page.



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ANALYTICAL DATA REPORT

for
Chemical Compounds Inc.
29-75 Riverside Ave.
Newark, NJ 07101

Project Name: SELF-MONITORING
Lab Case Number: 10950 - 1719

YELLOW #15, B- #13

MDL = METHOD DETECTION LIMIT

< = LESS THAN THE MDL

BASE NEUTRALS ACIDS

Lab ID: 1719-001

Client ID: 001

Matrix/Units: Aqueous - µg/L

Date Sampled : 8/9/95

Time Sampled : 11:00

Date Analyzed : 8/15/95

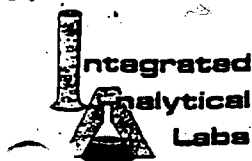
Compound	Conc.	MDL Compound	Conc.	MDL
3-Nitroaniline	< 40.0	40.0 Carbazole	< 40.0	40.0
Acenaphthene	< 40.0	40.0 Di-n-butylphthalate	< 40.0	40.0
2,4-Dinitrophenol	< 40.0	40.0 Fluoranthene	< 40.0	40.0
4-Nitrophenol	< 40.0	40.0 Benzidine	< 40.0	40.0
2,4-Dinitrotoluene	< 40.0	40.0 Pyrene	< 40.0	40.0
Dibenzofuran	< 40.0	40.0 3,3'-Dimethylbenzidine	< 40.0	40.0
Diethylphthalate	< 40.0	40.0 Butylbenzylphthalate	< 40.0	40.0
Fluorene	< 40.0	40.0 3,3'-Dichlorobenzidine	< 40.0	40.0
4-Chlorophenyl-phenylether	< 40.0	40.0 Benzo[a]anthracene	< 40.0	40.0
4-Nitroaniline	< 40.0	40.0 Chrysene	< 40.0	40.0
4,6-Dinitro-2-methylphenol	< 40.0	40.0 bis(2-Ethylhexyl)phthalate	< 40.0	40.0
N-Nitrosodiphenylamine	< 40.0	40.0 Di-n-octylphthalate	< 40.0	40.0
1,2-Diphenylhydrazine/Azobenzene	< 40.0	40.0 Benzo[b]fluoranthene	< 40.0	40.0
4-Bromophenyl-phenylether	< 40.0	40.0 Benzo[k]fluoranthene	< 40.0	40.0
Hexachlorobenzene	< 40.0	40.0 Benzo[a]pyrene	< 40.0	40.0
Pentachlorophenol	< 40.0	40.0 Indeno[1,2,3-cd]pyrene	< 40.0	40.0
Phenanthrene	< 40.0	40.0 Dibenz[a,h]anthracene	< 40.0	40.0
Anthracene	< 40.0	40.0 Benzo[g,h,i]perylene	< 40.0	40.0

All NJDEP protocol were followed during analyses. These data have been reviewed and accepted by:

Michael H. Leftin, Ph.D.
Laboratory Director

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866300068



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ANALYTICAL DATA REPORT

for

Chemical Compounds Inc.
29-75 Riverside Ave.
Newark, NJ 07101

Project Name: Internal Monitoring
Lab Case Number : 10950 - 1439

NOPD

MDL = METHOD DETECTION LIMIT

< = LESS THAN THE MDL

VOLATILES - (601/602)

Lab ID : 1439-001

Client ID : 001

Matrix/Units : Aqueous - $\mu\text{g/L}$

Date Sampled : 7/7/95

Time Sampled : 14:00

Date Analyzed : 7/12/95

Compound	Conc.	MDL	Compound	Conc.	MDL
Chloromethane	< 50.0	50.0	Bromodichloromethane	< 50.0	50.0
Vinyl chloride	< 50.0	50.0	2-Chloroethylvinyl ether	< 50.0	50.0
Bromomethane	< 50.0	50.0	cis-1,3-Dichloropropene	< 50.0	50.0
Chloroethane	< 50.0	50.0	Toluene	< 50.0	50.0
Trichlorofluoromethane	< 50.0	50.0	trans-1,3-Dichloropropene	< 50.0	50.0
1,1-Dichloroethene	< 50.0	50.0	1,1,2-Trichloroethane	< 50.0	50.0
Methylene chloride	< 100.0	100.0	Tetrachloroethene	< 50.0	50.0
trans-1,2-Dichloroethene	< 50.0	50.0	Dibromochloromethane	< 50.0	50.0
1,1-Dichloroethane	< 50.0	50.0	Chlorobenzene	< 50.0	50.0
Chloroform	< 50.0	50.0	Ethylbenzene	< 50.0	50.0
1,1,1-Trichloroethane	< 50.0	50.0	Xylenes, total	< 50.0	50.0
Carbon tetrachloride	< 50.0	50.0	Bromoform	< 50.0	50.0
1,2-Dichloroethane	< 50.0	50.0	1,1,2,2-Tetrachloroethane	< 50.0	50.0
Benzene	< 50.0	50.0	1,3-Dichlorobenzene	< 50.0	50.0
Trichloroethene	< 50.0	50.0	1,4-Dichlorobenzene	< 50.0	50.0
1,2-Dichloropropane	< 50.0	50.0	1,2-Dichlorobenzene	< 50.0	50.0

TOTAL CYANIDE

Lab ID : 1439-001

Client ID : 001

Matrix/Units : Aqueous - $\mu\text{g/L}$

Date Sampled : 7/7/95

Time Sampled : 14:00

Date Analyzed : 7/12/95

Result

MDL

< 0.05

0.05

All NJDEP protocol were followed during analyses. These data have been reviewed and accepted by:

Michael H. Leftin
Michael H. Leftin Ph.D.
Laboratory Director

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New Jersey Certified Lab# 14751

New York Certified Lab # 11402



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866300069

ANALYTICAL DATA REPORT

for

Chemical Compounds Inc.
29-75 Riverside Ave.
Newark, NJ 07101

Project Name: Self-Monitoring
Lab Case Number : 10950 - 1438

NOPD

MDL = METHOD DETECTION LIMIT

< = LESS THAN THE MDL

BASE NEUTRALS

Lab ID : 1438- 001

Client ID : 001

Matrix/Units : Aqueous - µg/L

Date Sampled : 7/7/95

Time Sampled : 14:00

Date Analyzed : 7/15/95

Compound	Conc.	MDL	Compound	Conc.	MDL
N-Nitrosodimethylamine	< 50.0	50.0	Diethylphthalate	< 50.0	50.0
Aniline	< 50.0	50.0	Fluorene	< 50.0	50.0
bis(2-Chloroethyl)ether	< 50.0	50.0	4-Chlorophenyl-phenylether	< 50.0	50.0
1,3-Dichlorobenzene	< 50.0	50.0	4-Nitroaniline	< 50.0	50.0
1,4-Dichlorobenzene	< 50.0	50.0	N-Nitrosodiphenylamine	< 50.0	50.0
Benzyl alcohol	< 50.0	50.0	1,2-Diphenylhydrazine/Azobenzene	< 50.0	50.0
1,2-Dichlorobenzene	< 50.0	50.0	4-Bromophenyl-phenylether	< 50.0	50.0
bis(2-chloroisopropyl)ether	< 50.0	50.0	Hexachlorobenzene	< 50.0	50.0
N-Nitroso-di-n-propylamine	< 50.0	50.0	Phenanthrene	< 50.0	50.0
Hexachloroethane	< 50.0	50.0	Anthracene	< 50.0	50.0
Nitrobenzene	< 50.0	50.0	Carbazole	< 50.0	50.0
Isophorone	< 50.0	50.0	Di-n-butylphthalate	< 50.0	50.0
bis(2-Chloroethoxy)methane	< 50.0	50.0	Fluoranthene	< 50.0	50.0
1,2,4-Trichlorobenzene	< 50.0	50.0	Benzidine	< 50.0	50.0
Naphthalene	< 50.0	50.0	Pyrene	< 50.0	50.0
4-Chloroaniline	< 50.0	50.0	3,3'-Dimethylbenzidine	< 50.0	50.0
Hexachlorobutadiene	< 50.0	50.0	Butylbenzylphthalate	< 50.0	50.0
2-Methylnaphthalene	< 50.0	50.0	3,3'-Dichlorobenzidine	< 50.0	50.0
Hexachlorocyclopentadiene	< 50.0	50.0	Benzo[a]anthracene	< 50.0	50.0
2-Chloronaphthalene	< 50.0	50.0	Chrysene	< 50.0	50.0
2-Nitroaniline	< 50.0	50.0	bis(2-Ethylhexyl)phthalate	< 50.0	50.0
Dimethylphthalate	< 50.0	50.0	Di-n-octylphthalate	< 50.0	50.0
2,6-Dinitrotoluene	< 50.0	50.0	Benzo[b]fluoranthene	< 50.0	50.0
Acenaphthylene	< 50.0	50.0	Benzo[k]fluoranthene	< 50.0	50.0
3-Nitroaniline	< 50.0	50.0	Benzo[a]pyrene	< 50.0	50.0
Acenaphthene	< 50.0	50.0	Indeno[1,2,3-cd]pyrene	< 50.0	50.0
2,4-Dinitrotoluene	< 50.0	50.0	Dibenz[a,h]anthracene	< 50.0	50.0
Dibenzofuran	< 50.0	50.0	Benzo[g,h,i]perylene	< 50.0	50.0

All NJDEP protocol were followed during analyses. These data have been reviewed and accepted by:

Michael H. Leftin
Michael H. Leftin, Ph.D.
Laboratory Director

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New Jersey Certified Lab# 14751

New York Certified Lab # 11402



Integrated Analytical Laboratories, Inc.

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866300070

ANALYTICAL DATA REPORT

for
Chemical Compounds Inc.
29-75 Riverside Ave.
Newark, NJ 07101

Project Name: Self-Monitoring
Lab Case Number : 10950 - 1438

NOPD

MDL = METHOD DETECTION LIMIT

< = LESS THAN THE MDL

ACIDS

Lab ID : 1438- 001

Client ID : 001

Matrix/Units : Aqueous - µg/L

Date Sampled : 7/7/95

Time Sampled : 14:00

Date Analyzed : 7/18/95

Compound	Result	Q	MDL
Phenol	< 10.0		10.0
2-Chlorophenol	< 10.0		10.0
2-Methylphenol	< 10.0		10.0
4-Methylphenol	< 10.0		10.0
2-Nitrophenol	< 10.0		10.0
2,4-Dimethylphenol	< 10.0		10.0
Benzoic acid	< 50.0		50.0
2,4-Dichlorophenol	< 10.0		10.0
4-Chloro-3-methylphenol	< 10.0		10.0
2,4,6-Trichlorophenol	< 10.0		10.0
2,4,5-Trichlorophenol	< 10.0		10.0
2,4-Dinitrophenol	< 10.0		10.0
4-Nitrophenol	< 10.0		10.0
4,6-Dinitro-2-methylphenol	< 10.0		10.0
Pentachlorophenol	< 10.0		10.0

pH/Corrosivity

Lab ID : 1438- 001

Client ID : 001

Matrix/Units : Aqueous - µg/L

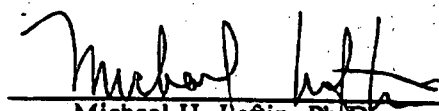
Date Sampled : 7/7/95

Time Sampled : 14:00

Date Analyzed : 7/13/95

Compound	Result	MDL
pH	12.58	±.02

All NJDEP protocol were followed during analyses. These data have been reviewed and accepted by:


Michael H. Leftin, Ph.D.
Laboratory Director

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ACCREDITED LABORATORIES, INC.
VOLATILE ORGANIC ANALYSIS DATA

866300071

CASE NUMBER 2713
FILE NUMBER 9507011
TA FILE A3114
CLIENT NAME CCI
FIELD ID RED3

MATRIX Aqueous
DILUTION FACTOR 10
DATE EXTRACTED
DATE ANALYZED 06/02/95
ANALYZED BY LARRY

CAS #	COMPOUND	UG/L	MCL
107028	Acrolein	U	61
107131	Acrylonitrile	U	66
74873	Chloromethane	U	20
74839	Bromomethane	U	20
75014	Vinyl Chloride	U	20
75003	Chloroethane	U	20
75092	Methylene Chloride	32 W	10
67641	Acetone	U	18
75150	Carbon Disulfide	U	4.0
75694	Trichlorofluoromethane	U	4.0
75354	1,1-Dichloroethene	U	4.0
75343	1,1-Dichloroethane	U	4.0
156605	trans-1,2-Dichloroethene	U	4.0
67663	Chloroform	41 W	4.0
107062	1,2-Dichloroethane	50 W	4.0
78933	2-Butanone	54	4.0
71556	1,1,1-Trichloroethane	U	4.0
735	Carbon Tetrachloride	U	4.0
7094	Vinyl Acetate	U	8.0
74	Bromodichloromethane	31 W	4.0

CAS #	COMPOUND	UG/L	MCL
78875	1,2-Dichloropropane	U	4.0
10061015	cis-1,3-Dichloropropane	U	4.0
79016	Trichloroethene	U	4.0
71432	Benzene	U	4.0
124481	Dibromochloromethane	U	4.0
79005	1,1,2-Trichloroethane	U	4.0
10061026	trans-1,3-Dichloropropene	U	4.0
110758	2-Chloroethylvinylether	U	20
75252	Bromoform	U	4.0
591786	2-Hexanone	U	9.0
108101	4-Methyl-2-pentanone	U	7.0
127184	Tetrachloroethene	U	4.0
79345	1,1,2,2-Tetrachloroethane	U	6.0
108883	Toluene	17	5.0
108907	Chlorobenzene	U	4.0
100414	Ethylbenzene	U	10
100425	Styrene	U	4.0
1330207	m,p-Xylene	35	28
95476	o-Xylene	U	21
156592	cis-1,2-Dichloroethene	U	4.0

SURROGATE COMPOUNDS	RECOVERY	LIMITS	STATUS
1,2-Dichloroethane-d4	101 %	76-114	OK
Toluene-d8	100 %	88-110	OK
Bromofluorobenzene	96 %	86-115	OK

J - Indicates compound concentration found below MCL.
U - Indicates compound analyzed for but not detected.

B - Indicates compound found in associated blank.
W - Result exceeds specific ground water quality criteria.*

* Flags are based on Specific Ground Water Quality Criteria from New Jersey Register dated February 1, 1993.

866300072

ACCREDITED LABORATORIES, INC.
BNA ORGANIC ANALYSIS DATA

CASE NUMBER 2713
 SAMPLE NUMBER 9507011
 DATA FILE JF1875
 CLIENT NAME CCI
 FIELD ID RED#3

MATRIX Aqueous
 DILUTION FACTOR 5
 DATE EXTRACTED 05/24/95
 DATE ANALYZED 06/07/95
 ANALYZED BY PAUL

CAS #	COMPOUND	UG/L	MDL	CAS #	COMPOUND	UG/L	MDL
108952	Phenol	U	50	59507	4-Chloro-3-methylphenol	U	50
95578	2-Chlorophenol	U	50	88062	2,4,6-Trichlorophenol	U	50
95487	2-Methylphenol	U	50	95954	2,4,5-Trichlorophenol	U	250
108394	3,4-Methylphenol	U	50	51285	2,4-Dinitrophenol	U	250
88755	2-Nitrophenol	U	50	100027	4-Nitrophenol	U	250
105679	2,4-Dimethylphenol	U	50	534521	4,6-Dinitro-2-methylphenol	U	250
120832	2,4-Dichlorophenol	U	50	87865	Pentachlorophenol	U	250
111444	bis(-2-Chloroethyl)Ether	U	50	121142	2,4-Dinitrotoluene	U	50
541731	1,3-Dichlorobenzene	U	50	84662	Diethylphthalate	U	50
106467	1,4-Dichlorobenzene	U	50	7005723	4-Chlorophenyl-phenylether	U	50
100516	Benzyl Alcohol	U	50	86737	Fluorene	U	50
95501	1,2-Dichlorobenzene	U	50	100016	4-Nitroaniline	U	250
108601	bis(2-Chloroisopropyl)ether	U	50	86306	N-Nitrosodiphenylamine	U	50
621647	N-Nitroso-Di-n-propylamine	U	50	101553	4-Bromophenyl-phenylether	U	50
67721	Hexachloroethane	U	50	118741	Hexachlorobenzene	U	50
98953	Nitrobenzene	U	50	85018	Phenanthrene	U	50
78591	Isophorone	U	50	120127	Anthracene	U	50
5850	Benzoic Acid	U	250	84742	Di-n-Butylphthalate	U	50
111911	bis(-2-Chloroethoxy)Methane	U	50	206440	Fluoranthene	U	50
120821	1,2,4-Trichlorobenzene	U	50	129008	Pyrene	U	50
91203	Naphthalene	U	50	85687	Butylbenzylphthalate	U	50
106479	4-Chloroaniline	U	50	91941	3,3'-Dichlorobenzidine	U	100
87683	Hexachlorobutadiene	U	50	56553	Benzo(a)Anthracene	U	50
91576	2-Methylnaphthalene	U	50	117817	Bis(2-Ethylhexyl)Phthalate	U	50
77474	Hexachlorocyclopentadiene	U	50	218019	Chrysene	U	50
91587	2-Chloronaphthalene	U	50	117840	Di-n-octyl phthalate	U	50
88744	2-Nitroaniline	100 J	250	205992	Benzo(b)fluoranthene	U	50
131113	Dimethyl Phthalate	U	50	207089	Benzo(k)Fluoranthene	U	50
208968	Acenaphthylene	U	50	50328	Benzo(a)Pyrene	U	50
99092	3-Nitroaniline	U	250	193395	Indeno(1,2,3-cd)Pyrene	U	50
83329	Acenaphthene	U	50	53703	Dibenzo(a,h)Anthracene	U	50
132649	Dibenzofuran	U	50	191242	Benzo(g,h,i)Perylene	U	50
646202	2,6-Dinitrotoluene	U	50	62759	N-Nitrosodimethylamine	U	50

SURROGATE COMPOUNDS

Nitrobenzene-d5
 2-Fluorobiphenyl
 Terphenyl-d14
 Phenol-d5
 2-Fluorophenol
 2,4,6-Tribromophenol

RECOVERY

59 %
 81 %
 21 %
 24 %
 122 %

LIMITS

35-114
 43-116
 33-141
 10- 94
 21-100

STATUS

OK
 OK
 OUT
 OK
 OUT

***** NOT DETECTED *****

J - Indicates compound concentration found below MDL.

J - Indicates compound analyzed for but not detected.

B - Indicates compound found in associated blank.

W - Result exceeds specific ground water quality criteria.*

* Flags are based on Specific Ground Water Quality Criteria from New Jersey Register dated February 1, 1993.

** 3-Methylphenol and 4-Methylphenol can not be separated by the method applied

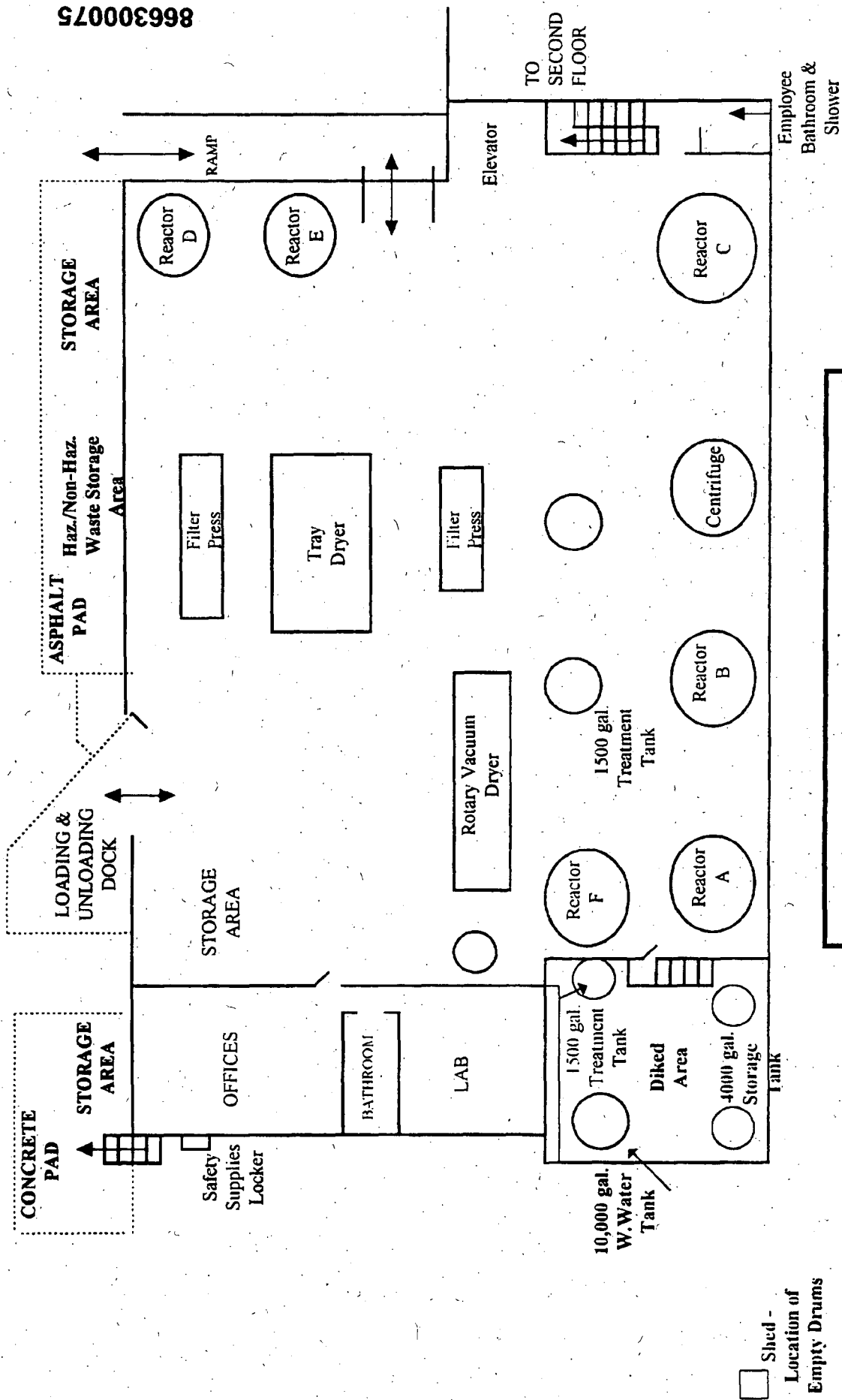
866300073

ACCREDITED LABORATORIES, INC.
GENERAL CHEMISTRY ANALYSIS DATA

Case #: 2713
Sample #: 9507011
Client Name: CCI
Field Number: RED#3

Matrix: Aqueous
Date Received: 05/19/95

ANALYTES	RESULTS	MDL	UNITS	DILUTION FACTOR	METHOD RESULTS	BLANK MDL	ANALYSIS DATE
Cyanide, Total	ND	0.01	mg/L	1.	ND	0.01	05/23/95



CHEMICAL COMPOUNDS INC. 29-75 Riverside Ave. Newark, N.J. 07104	
LOCATION OF STORAGE AREAS	
Signature: <i>[Signature]</i>	Date: <i>7/22/96</i>

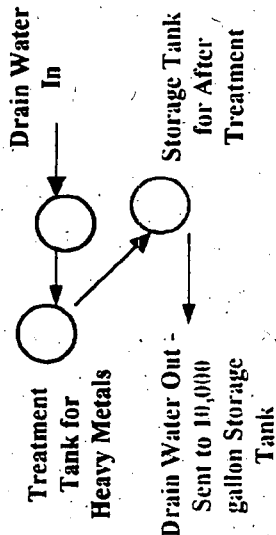
866300075

CHEMICAL COMPOUNDS INC.	
29-75 Riverside Ave.	
Newark, N.J. 07104	
WASTE WATER PLAN	
NOT SHOWN TO SCALE	
Signature: <i>[Signature]</i>	Date: 1/31/97

Loading & Unloading Dock

Concrete Pad for Storage

To Manhole Tie-In
Approx. 70 ft.



PRODUCTION AREA

ALL PROCESS & DRAIN WASTEWATER
TRANSFER TO A HOLDING/STORAGE
TANK NEXT TO SAMPLE POINT IN
BASEMENT AND THEN IS PUMPED OUT
OF BUILDING TO SEWER

Adjacent
Bldg. # 7

User Charge,
Pretreatment,
& Local Limit
Sampling

Wastewater Out -
to Sampling Point
for Discharge to
Sewer

Wastewater In -
from Production to
Storage Tank
After Necessary
Treatment

10,000 gal.
Wastewater
Tank

DIKED
AREA

RAMP to Basement

LAB

BATHROOM

OFFICES

PASSAIC RIVER

866300079

New Jersey Department of Environmental Protection and Energy
Division of Responsible Party Site Remediation
Bureau of Emergency Response
Region I

INVESTIGATION

Case #: 92-01-07-1025

File #: 0714
PAC CODE: TFF

Date: 01/07/92

Investigator: Matthew Garamone
Christopher Gibbons

Time Arrived: 1115

Time Departed: 1400

Location: Chemical Compounds, Inc.
Address: 29-75 Riverside Avenue
Newark, NJ

Responsible Party: Chemical Compounds, Inc.
Mailing Address: 29-75 Riverside Avenue
Newark, NJ

Location Phone #: 201-485-3211

Responsible Dept. Rep: Bob Swales - Newark OEM Phone #: 201-733-3664

Origin of Complaint: Oper. Piccitto - NJSP Phone #: 201-578-8173
Marine Bureau

I
II Nature of Complaint: Unknown liquid being discharged from pipe onto ground and into Passaic River at incident location.

III
Findings: BER Region I responded to Newark to investigate the report by the NJSP Marine Bureau at Newark Bay of the discharge of an unknown, purple liquid from a pipe at the Chemical Compounds facility and entering the Passaic River. MPO's Mundorff and Kirschner of the NJSP Marine Bureau at Newark Bay were investigating a complaint of a suspected illegal discharge from Chemical Compounds' facility by employees at the Napp-Grecco Company adjacent to the incident location. MPO's Mundorff and Kirschner reported to Investigators Garamone and Gibbons that they had observed a hose line coming from the rear of the Chemical Compounds' building and discharging an unknown, purple liquid onto the ground adjacent to the Passaic River. Inspection of the property between the facility and the river revealed a large stained area with a free-standing puddle of a dark purple liquid with a strong odor of acetic acid. There were also signs of spillage over the bulkhead and into the river at this location. No hose line was present in this area at the time of BER I's inspection at the incident location.

IV
At the rear of the property, near to the Napp-Grecco Co., is an open pit with an exposed sanitary sewer line. There were free-standing puddles of dark purple liquid in this area. According to Chemical Compounds' owners, Alberto Celleri and Harold Sullivan, the facility

has been experiencing problems with this sanitary line backing-up and was attempting to unclog it by pumping it out and snaking the line. According to Alberto Celleri, the large stained area of ground with a puddle of dark purple liquid, on the side of the facility next to the Passaic River, was the result of the floors of the process area being washed down by an employee. This puddle indicated positive by Drager for acetic acid and had a pH of 1.

Chemical Compounds, Inc. manufactures hair dyes. In particular, the facility has been producing red #3 and HC-blue #2 hair dyes. The dark purple liquid observed on the ground around the outside of the facility is attributed to these two dyes. The facility stores its waste liquid from their processes in a 5,500 gallon capacity tanker in the rear of the facility. Disposal of this material is through Chemical Waste Management which manifests the waste as a non-hazardous process liquid n.o.s. Prior to recycling methanol in waste processes, the facility also disposed of waste methanol through Chemical Waste Management and had an EPA generator number assigned to the facility (#NJ0108-66-1737). The facility maintains a tanker of methanol on-site with a capacity of 4,000 gallons for their processes. Floor drains at the facility discharge into the sanitary sewer system according to Mr. Celleri. The facility, however, has no permit from PVSC to discharge any material from their processes into the sanitary line.

MPO's Mundorff and Kirschner went to Clara Maas Hospital in Belleville due to chemical exposure at the incident location. In addition, 8 employees at the Napp-Greco Co. adjacent to the incident location sought medical attention for chemical exposure at First Care Medical Group in Kearny. Investigators from the Essex County Prosecutor's Office and the Division of Criminal Justice also performed an investigation of this incident. Investigators Garamone and Gibbons issued a NOV to Chemical Compounds, Inc. for the discharge and non-notification of a discharge of a hazardous substance pursuant to the spill act. The facility contracted ENSI, Inc. of Newark to perform a clean-up of all free-standing liquid on the property and to collect samples for analysis of the stained areas of ground and free-standing liquid. The affected areas were covered with plastic and the need to remove any contaminated soil based on these

conclusions: BER Region I responded to Newark to investigate the incident by the NJSP Marine Bureau of the illegal dumping of an unknown liquid into the Passaic River from the Chemical Compounds' facility. The discharge of an unknown, dark purple liquid containing acetic acid and/or acetic anhydride occurred onto the ground at the facility. ENSI, Inc. of Newark was hired by the facility to perform a clean-up. A permit was issued for this discharge and the incident is under a criminal investigation by both the State and the County.

866300080

MPR-09-92-10:50:10 2014BS4670

FROM Robert C Matule, Esq

T-861 P.02

Recommendations: This case will be referred to BFO-Metro for follow-up work regarding the removal of suspected contaminated soil affected by this discharge at the facility and to evaluate the hazardous waste disposal practices of the facility.

[Signature]
Investigator

01/13/92
Date

Date

Date

866300081

NEWARK FIRE DEPARTMENT

OFFICE OF HAZARDOUS MATERIALS

**188 Mulberry Street
Newark, New Jersey 07102**

(201) 733-7506

STANLEY J. KOSSUP

Director/Fire Chief

Fax (201) 733-7468

**Chemical Compounds
29-75 Riverside Avenue
Newark, NJ 07104**

January 10, 1992

attn: Mr. Harold Sullivan

On January 7, 1992, the Newark Fire Department's Hazardous Materials Unit responded to your facility, Chemical Compounds at, 29 Riverside Avenue. The complaint regarded unidentified liquid flowing from a hose line on the second floor of your building, down a set of exterior stairs, onto the ground and into the Passaic River.

This action is a violation of the City of Newark's Hazardous Materials Regulations. You are in violation of the following:

Section 8.4 Drainage from production facilities, including buildings, and other process areas shall be so engineered as to provide a means of secondary containment for spilled hazardous materials.

Process wastewater and cooling water pipes, plant drains and similar installations which drain into sewers, storm drains, public wastewater treatment plants, watercourses or other routes which drain to waters of the state shall be engineered so that spills of hazardous materials will not escape through them to waters of the State. If hazardous materials captured in secondary containment systems drain into process wastewater lines, provisions must be made to treat or remove the hazardous materials before the water is discharged.

On January 7, 1992, you or one of your employees disconnected a hose line leading into a waste recovery truck. The hose line was rerouted, enabling liquid to flow onto unprotected earth, and into the Passaic River.

866300082

Section 10.1b It shall be unlawful to use or operate any bulk storage area or part thereof without:

(b) providing for the segregation of potentially reactive chemicals which materials or which may react so as to form hazardous materials, and which present or cause a hazardous or dangerous condition. X

It was noted that oxidizers, (M & T Chromic Acid) are stacked on top of corrosives. (Ethylene Chlorhydrin)

Section 12.2 All loading, unloading or transfer of hazardous materials shall take place by a qualified person.

All vehicles and rail cars carrying hazardous materials shall stand or be parked only in a secure area where they are under the care, custody, and control of a Permit holder.

A person who loads or unloads hazardous materials shall comply with the applicable Federal laws and regulations, in addition to any local and state requirements.

An unqualified person disconnected the hose leading to the waste container. If the person was qualified he would have been required to know that the product he was discharging onto the ground was hazardous. X

Section 15.1 In the event of fire, explosion, structural failure, leakage or other discharge relating to hazardous materials requiring notifications under Federal or State law, the permit holder shall also notify the Director.

The permittee shall submit to the Director within ten days a copy of the written report pursuant to the Hazardous Substance Discharges: - Reports and Notices Act, N.J.S.A. 13:1K-15, and regulations promulgated thereunder.

The permittee shall also provide information to the Director relating to the ability of the permittee to contain and dispose of the hazardous material, the estimated time it will take to complete storage and disposal, the degree of hazard created and the quantity and type of material released. The Director may verify that the hazardous material is being contained and appropriately disposed. X

The appropriate agencies were not notified when the spill, leak or discharge occurred. A private citizen reported this incident to the State Police.

866300083

Section 17.1c Failure to abate, correct or rectify any noncompliance with the provisions of these Regulations any permit conditions or any provisions of the Hazardous Materials Management Plan with the time specified in the Notice of Noncompliance;

Section 17.3 If the cause of the noncompliance is not abated, corrected, or rectified within the time specified in the Notice of Noncompliance, a Notice of Violation shall be issued.

The Notice of Violation shall be in writing and shall include a reference to the original Notice of Noncompliance, the unconditional right to a hearing and the remedial action to be undertaken.

Under conditions of imminent hazard the Director may issue a Notice of Violation without issuing a Notice of Noncompliance.

Section 17.4 A request for a hearing by the permittee shall be given to the Director in writing, setting forth in particular any defense the permittee might have in regard to the alleged violations, and a brief statement of the factual matters in support thereof. The notice of the hearing date shall be given by the Director at least ten (10) days prior to the hearing date.

Section 18.4 Every Permit holder shall insure that a qualified person shall be in charge at all times and at each and every place where hazardous materials operations are carried out. The qualified person shall remain on the premises as long as the manufacture, use processing, or handling of hazardous materials is being carried out and shall return to the premises when required under emergency circumstances. To be a qualified person, the individual shall be knowledgeable in the chemical and physical processes utilized by the Permit holder.

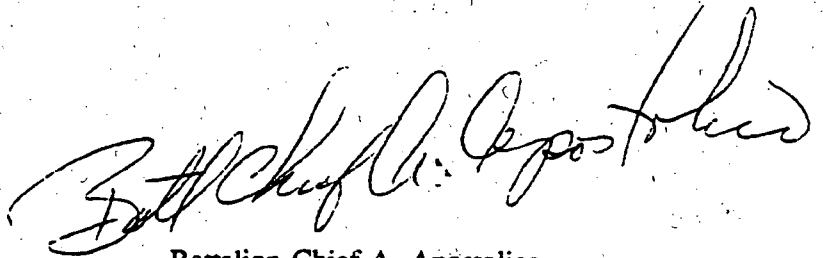
The Permit holder shall furnish to the Director a list of qualified persons with their addresses and telephone numbers to be contacted in the event of any emergency circumstance, to be updated annually. The director shall provide said personnel with passes to be shown to City emergency personnel to allow the holder to pass through any manned emergency barricades and enter the permittee facility in the event of an emergency.

The person who placed the hose leading from the building to the ground and into the river did not remain on the premises.

866300084

Section 20.2 Whenever in these Regulations any act is prohibited or is made or declared to be unlawful, or whenever in these Regulations the performance of any act is required or the failure to perform any act is made or declared to be unlawful, the commission of any such prohibited act or the failure to perform any such act, shall be punished by a fine or not more than \$1,000.00 per day per violation or by imprisonment for a term of not more than 90 days, or by any combination of such fine and imprisonment. Each day any violation of these Regulations continues shall be considered a separate offense.

You have been found to be in violation of five sections of the City of Newark's Hazardous Materials Regulations.



Battalion Chief A. Apostolico

AA:lm

733-7506
733-7492
FAX 201 844
Vincent

866300085

866300087



TOTAL ANALYTICAL SERVICES FOR A SAFE ENVIRONMENT

nytest environmental inc.

January 31, 1992

Ensi Inc.
194 Avenue L
Newark, NJ 07105

Attn: Fred Virrazzi

Nyttest is pleased to submit our Project No. 9218614
Log in No. 10997 on your sample (s) received: 1/09/92

Test sample (s) associated with this project will be retained
for a period of thirty (30) days, unless otherwise instructed.

My staff is available to answer any questions concerning our
report and we look forward to serving your future analytical
needs.

Very truly yours,

Nyttest Environmental Inc.

Remo Gigante
Exec. VP

RG:
Enc.

SHIPPED VIA: UPS RED

nytest environmental inc.

Sample Identification and Results

Log In No.: 10997

Sample No: 1

Lab Sample ID No.: 1099701

Results	Max. Allowable Levels	Found
pH @ 20 C	2 - 12.5	4.35
Ignitability, F PM	140	> 212
Corrosivity, inches/year	0.250	< 0.01
Reactivity to Cyanide, PPM	-	< 1.0
Reactivity to Sulfide, PPM	-	< 1.0
Total Solids, %	-	49.3
Petroleum Hydrocarbons, PPM (Dry Wt.)	-	5350
PCB's ,PPM (Dry wt.)	-	< 2.0

ND = None Detected

< = Less than

00010

866300088

Harold Sullivan

817-5715

TECHNION INC.
250 Delawanna Avenue
Clifton, New Jersey 07014
201-773-5013
FAX #: 201-773-4788

LAB DEP #: 07190

CLIENT: Chemical Compounds Inc.
CLIENT REF: 22592
MATERIAL: One (1) composite from
eleven (11) drums

DATE: 2-27-92
TECHNION REF: 16031
DATE RECEIVED: 2-25-92
LAB ID: 0122T

ANALYSIS REQ: RCRA Waste characteristics

The above samples were as received on 2-25-92 and analyzed
as requested.

ANALYST: Sam Yart, Mara Fishman

CERTIFICATE OF ANALYSIS

TEST RESULTS:

All test results are as attached.

Respectfully submitted,

Susan Baturay

Susan Baturay, D.Sc.
Laboratory Director

SB/sn
16031

866300089

TECHNION INC.,
250 Delawanna Avenue
Clifton, New Jersey 07014
Lab Dep #: 07190

CLIENT: Chemical Compounds Inc.

SAMPLE TYPE: Liquid

RUN DATE/TIME: 2-27-92/10:00

SAMPLE DATED: 2-25-92

SAMPLE I.D.: Composite

TEST RESULTS FOR TCLP METALS

<u>METALS</u>	<u>RESULTS</u>	<u>BLANK</u>	<u>MDL</u>	<u>MAX. ALLOWABLE LIMITS</u>
Arsenic	N.D.	<0.01	0.01	5.0
Barium	N.D.	<0.01	0.01	100.0
Cadmium	N.D.	<0.01	0.01	1.0
Chromium	N.D.	<0.01	0.01	5.0
Lead	N.D.	<0.01	0.01	5.0
Mercury	N.D.	<0.002	0.002	0.2
Selenium	N.D.	<0.01	0.01	1.0
Silver	N.D.	<0.01	0.01	5.0

Test results are in mg/l, unless specified.

N.D.: Not Detected

M.D.L.: Minimum Detection Limit

866300090

TECHNION INC.,
250 Delawanna Avenue
Clifton, New Jersey 07014
Lab Dep #: 07190

CLIENT: Chemical Compounds Inc.

SAMPLE TYPE: Liquid

RUN DATE: 2-27-92

DATE SAMPLED: 2-25-92

SAMPLE I.D.: Composite

HAZARDOUS WASTE CHARACTERISTICS

<u>WASTE CHARACTERISTICS</u>	<u>RESULTS</u>	<u>BLANK</u>	<u>MDL</u>	<u>MAX. ALLOWABLE LIMITS (ppm)</u>
PCB (mg/l)	N.D.	N.D.	0.36	(mg/kg) 5-50
Reactivity for CN-(mg HCN/l)	N.D.	N.D.	5.0	250
Reactivity for S-(mg H ₂ S/l)	N.D.	N.D.	10.0	500
Total Pet.Hydc.(TPHC) (mg/l)	3.0	N.D.	0.10	30000
Ignitability (oF)	Not Ignitable	N/A	N/A	>140
Corrosivity as pH	4.5	N/A	N/A	2<pH < 12.5

Test results are in mg/l, unless specified.

N/A: Not Applicable

N.D.: Not Detected

MDL: Minimum Detection Limit

866300091

TECHNION INC.,
250 Delawanna Avenue
Clifton, New Jersey 07014
Lab Dep #: 07190

CLIENT: Chemical Compounds Inc.

SAMPLE TYPE: Liquid

RUN DATE: 2-26-92

DATE SAMPLED: 2-25-92

RESULTS FOR pH MEASUREMENTS

<u>SAMPLE ID</u>	<u>RESULTS (unit)</u>
1	5.2
2	5.1
3	4.9
4	5.1
5	4.2
6	5.8
7	4.3
8	5.7
9	4.1
10	4.2
11	4.2

866300092

SAMPLE LOG-IN SHEET

Technion Inc.
Dep #: 07190

Page 1 of 1

Received By (Print Name):

B. Merich

Log-in Date:

2-25-92

Received By (Signature):

B. Merich

Sample ID#: 0122

CORRESPONDING

Sample Name: Chemical Compound
S Number:

SAMPLE
TAG
#

ASSIGNED
LAB
#

ANALYSIS
REQUESTED

REMARKS:
CONDITION OF
SAMPLE SHIPMENT, ETC.

Analysis Series

Present/Absent
Intact/Broken

Composite

TCLP Metals

11

PCB'S

11

TPHC

11

Reactivity (S)

11

Reactivity (CN)

11

Ignitability

11

Corrosivity

11

Analysis Series

Analysis Series

Analysis Series

Analysis Series

Analysis Series

Analysis Series

Analysis Series

Analysis Series

Analysis Series

Analysis Series

Analysis Series

Analysis Series

Sample Transfer

Fraction:

Area #:

By:

On:

Contact SMO and attach record of resolution

Reviewed By:

Logbook Page No.:

Date:

Logbook Page No.:

Results by 2-27 Afternoon
One Composite sample
obtained from 11 Drum Samples.

866300095

FILED

DEC 3 1994

GABRIEL M. AMBROSIO, ESQ.
464 Valley Brook Avenue
P.O. Box 911
Lyndhurst, New Jersey 07071
(201) 933-8844
Attorneys for Plaintiff

HARRY A. MARGOLIS
P.J. Ch.

<hr/>		SUPERIOR COURT OF NEW JERSEY
		: CHANCERY DIVISION - ESSEX COUNTY
PASSAIC VALLEY SEWERAGE	:	
COMMISSIONERS, a body politic :	DOCKET NO: C-338-93	
and corporate of the state of	:	
New Jersey,	:	Civil Action
Plaintiff,	:	
v.	:	CONSENT ORDER AND
	:	FINAL JUDGMENT
CHEMICAL COMPOUNDS, INC.,	:	
Defendant.	:	
<hr/>		

This matter having been opened to the Court by Gabriel M. Ambrosio, Esq. (John T. Ambrosio, Esq., appearing) on behalf of the plaintiff, the PASSAIC VALLEY SEWERAGE COMMISSIONERS ("PVSC"), alleging that the defendant, Chemical Compounds, Inc. ("Chemical Compounds"), violated the provisions of N.J.S.A. 58:14-1 et seq. by discharging pollutants in excess of Sewer Connection Permit No. 20407122 ("Permit"), the rules and regulations of the PVSC and the Categorical Pretreatment Regulations promulgated by the United States Environmental Protection Agency ("USEPA") at 40 C.F.R. § 414, and the defendant, without admitting any fact, liability or fault as to any or all of the allegations of the complaint, having consented to the entry of the within Consent Order and Final Judgment, and for good cause thus shown;

866300097

IT IS on this day of December 1994;

ORDERED that:

Civil Penalties

1. Within 10 days of the date hereof, the defendant, Chemical Compounds, shall pay to the PVSC the sum of six-thousand dollars (\$6,000.00) (the "Settlement Amount") in settlement of all civil penalties that could have been assessed against the defendant for allegedly having violated the provisions of N.J.S.A. 58:14-1 et seq. by discharging pollutants in excess of the Categorical Pretreatment effluent limitations promulgated at 40 C.F.R. § 414 and incorporated by reference in the Permit between July 1, 1991 and the present, including, but not limited to, those alleged violations set forth in the complaint filed by the plaintiff in this action. All settlement payments shall be made payable to the "Passaic Valley Sewerage Commissioners."

Compliance Schedule

2. Chemical Compounds shall comply with the following schedule for the purpose of controlling and eliminating discharges in excess of the Lead, Zinc and Cyanide limitations of the § 414 Categorical Pretreatment Regulation and the Permit:

(a) Chemical Compounds shall immediately commence and implement a study program for the purpose of identifying possible raw materials and in-plant processes which may be the source of Lead and Zinc entering its wastewater system.

(b) On or before December 1, 1994, Chemical Compounds shall submit a First Interim Report to the PVSC detailing its compliance with the discharge limitations for Lead, Zinc and Cyanide. If the results of the First Interim Compliance Report indicate that no additional pretreatment control equipment is required, Chemical Compounds shall be in compliance with the limitations for the discharge of Lead and Zinc on or before December 1, 1994. If the results of the First Interim Compliance Report indicate that additional pretreatment control equipment is required to achieve compliance with the discharge limitations for Lead, Zinc and Cyanide, Chemical Compounds shall retain the services of a qualified environmental consultant who shall evaluate its existing wastewater pretreatment system and make necessary recommendations for the purposes of controlling and eliminating discharges in excess of the Lead, Zinc and Cyanide discharge limitations of the Permit.

(c) In no event shall final compliance with the discharge limitations for Lead, Zinc and Cyanide be extended past April 1, 1995.

Progress Reports

3. Chemical Compounds shall submit to the PVSC monthly progress reports concerning its compliance with the requirements and obligations of this Order.

Final Report

4. Within ninety (90) days of completing the corrective action described in paragraph #2, the defendant shall submit to the PVSC a final report concerning its compliance with all applicable pretreatment standards.

Force Majeure

5. The completion date for the corrective action described in paragraph #2 or for the submission of any report required by this Order, shall be extended for the period of time that the defendant or its agent is prevented by a Force Majeure event from proceeding with the corrective action or submitting the required report. As used in this Order, a Force Majeure event shall mean an event which is beyond the reasonable control of the defendant including, but not limited to, such events as fire, explosion, inclement weather conditions (that create unforeseen delays), labor disputes, inability to obtain or unavoidable delay in the delivery of materials, inability to obtain or unavoidable delay in securing municipal approvals and/or work permits, inability to obtain or unavoidable delay in securing State approvals and/or Treatment Works Approval and unforeseen subsurface conditions. If the occurrence of a Force Majeure event causes or may cause delay in meeting any completion or submission date set forth above, defendant shall notify the PVSC in writing within ten (10) days of the occurrence of such event, the precise cause of the delay, the measures taken or to be taken by the defendant to prevent or minimize the delay, an estimate of the date by which such measures

will be completed or such report will be submitted, and an estimate of the duration of the delay. The defendant shall promptly implement all reasonable measures to prevent or minimize any such delays, prevent or minimize any adverse impact on the PVSC system as a result of such delays, and to comply with all requirements of this Order as soon as possible;

6. If the PVSC finds that: (a) the defendant has complied with the notice requirements of the preceding paragraph and; (b) the delay or anticipated delay has been or will be caused by a Force Majeure event, the PVSC shall extend the time for performance under this Order no longer than the delay resulting from the Force Majeure event. If the PVSC determines that: (a) the defendant did not comply with the notice requirements of the preceding paragraph or; (b) the event causing the delay does not constitute a Force Majeure event, failure to complete the corrective action under paragraph #2 or to submit any report required hereunder shall be a violation of the requirements of this Order and subject the defendant to sanctions under the applicable statutes and regulations. The burden of establishing that any delay is caused by a Force Majeure event rests with the defendant;

General Provisions

7. The corrective action undertaken by the defendant pursuant to this Order shall constitute the penalty for any violations of the Categorical Pretreatment effluent limitations promulgated at 40 C.F.R. § 414 during the period covered by the compliance schedule. In the event that the defendant completes all

corrective action on or before the completion dates set forth in the compliance schedule, and as modified by any Force Majeure event, any such exceedances experienced during this period shall not be subject to additional penalty.

8. The defendant further understands that any exceedance of the effluent limitation for discharges of Lead, Zinc and/or Cyanide experienced after the final completion date set forth in the compliance schedule, shall be subject to further enforcement proceedings and civil penalties.

9. Nothing in this Order shall preclude the PVSC from taking enforcement action against the defendant for matters not set forth herein or in the complaint.

10. All provisions of the Permit shall remain in full force and effect and are not modified by this Order. The defendant expressly understands that the compliance requirements contained in this Order do not modify any provisions of the Permit or any duties or liabilities of the defendant thereunder.

11. This Order shall be binding on the defendant, its assignees and any trustee in bankruptcy or receiver appointed pursuant to a proceeding in law or equity.

12. Defendant shall perform all work conducted pursuant to this Order in accordance with prevailing professional standards.

13. This Order shall not relieve the defendant from obtaining and complying with all applicable federal, state and local permits, as well as all applicable statutes and regulations while carrying out the obligations imposed by this Order.

14. The obligations and civil penalties of this Order are imposed pursuant to the police powers of the State for the enforcement of law and the protection of public health, safety, welfare and are not intended to constitute a debt or debts which may be limited or discharged in a bankruptcy proceeding.

15. In addition to the PVSC's statutory and regulatory rights to enter and inspect, the defendant shall allow the PVSC and its authorized representatives access to its facility at all times for the purpose of monitoring defendant's compliance with this Order;

16. The defendant shall make available to the PVSC all technical records and contractual documents maintained or created by the defendant or its contractors in connection with this Order.

17. The PVSC reserves the right to require the defendant to take additional actions as authorized by law should the PVSC determine that such actions are necessary to protect human health, the environment or the PVSC system. Nothing in this Order shall constitute a waiver of any statutory right of the PVSC to require the defendant to undertake such additional measures should the PVSC determine that such measures are necessary, subject to the defendant's rights under this Order, applicable statutes and regulations.

18. The defendant shall not construe any informal advice, guidance, suggestions or comments by the PVSC or by person(s) acting on behalf of the PVSC, as relieving the defendant of its obligation to obtain written approvals as may be required herein, unless such advice, guidance, suggestions or comments by the PVSC

shall be submitted in writing to the defendant.

19. The defendant shall give written notice of this Order to any successor in interest prior to transfer of ownership of the facility which is the subject of this Order and shall simultaneously verify to the PVSC that such notice has been given.

20. No modification or waiver of this Order shall be valid except by written amendment duly executed by the defendant and the PVSC.

21. The Court shall retain jurisdiction over the parties to this action solely for the purpose of enforcing the provisions of this Order.

22. The PVSC reserves the right to reopen this case in the event the Commissioners of the PVSC, at their next available public meeting, do not accept the recommendations of the chief counsel to enter into this Consent Order and Final Judgment.

23. This Order does not constitute, nor shall it be used as evidence of the findings of any fact or the admission of any facts, fault or liability on the part of the defendant, nor shall any of the alleged violations settled herein be utilized in any way as prior violations for the purposes of characterizing any other violations, alleged or actual, existing or hereinafter committed.

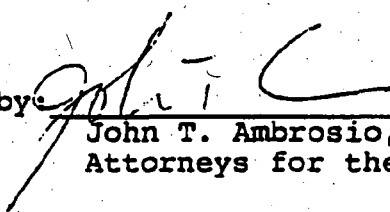

Hon. Harry A. Margolis, P.J.Ch.

The undersigned hereby consent to the entry of the foregoing order, both as to substance and form.

GABRIEL M. AMBROSIO, ESQ.


Dated: 2/2/94

by


John T. Ambrosio, Esq.
Attorneys for the PVSC

CHEMICAL COMPOUNDS, INC.

Dated: 11/29/94


Authorized Signature

ALBERTO CELLERI
Print Name

PRESIDENT
Print Title & Position

JTA:ja
Chemical Compounds.con

**VIOLATION NOTICE
HAZARDOUS MATERIALS REGULATIONS**

**CITY OF NEWARK
FIRE DEPARTMENT**

1010 18th Ave, Newark, N.J. 07108
(201) 733-7495

☒ NOTICE OF VIOLATION AND ORDER
TO TERMINATE

☐ NON COMPLIANCE

☐ COURT ACTION REQUIRED

IDENTIFICATION

LOCATION: 29 Riverside Avenue

Block: _____ Lot: _____

OWNER:

Name Chemical Compounds

AGENT:

Name Harold Sullivan

Address 29-75 Riverside Avenue

Address 29-75 Riverside Avenue

Town/State/Zip Newark, NJ 07104

Town/State/Zip Newark, NJ 07104

"HM" Permit #: _____

ACTION

DATE OF NOTICE: _____

COMPLIANCE DUE DATE: _____

DATE OF INSPECTION: _____

TAKE NOTICE that you have been found to be in violation of the City of Newark Ordinance (6S&FE amended March 21, 1990) governing hazardous materials:

Section 8.4

Section 10.1 B

Section 12.2

Section 15.1

Section 18.4

If you have any questions concerning this matter, please call: (201) 733 - 7495

Inspector

Date

Hazmat Officer

Date

Officer in Charge Fire Prevention & Safety

Received by:

Date

866300107

NEWARK FIRE DEPARTMENT

OFFICE OF HAZARDOUS MATERIALS
188 Mulberry Street
Newark, New Jersey 07102

STANLEY J. KOSSUP
Director/Fire Chief

(201) 733-7506

Fax (201) 733-7468

Chemical Compounds
29-75 Riverside Avenue
Newark, NJ 07104

January 10, 1992

Letter to: Mr. Harold Sullivan

On January 7, 1992, the Newark Fire Department's Hazardous Materials Unit responded to your facility, Chemical Compounds at, 29 Riverside Avenue. The complaint regarded unidentified liquid flowing from a hose line on the second floor of your building, down a set of exterior stairs, onto the ground and into the Passaic River.

This action is a violation of the City of Newark's Hazardous Materials Regulations. You are in violation of the following:

Section 8.4 Drainage from production facilities, including buildings, and other process areas shall be so engineered as to provide a means of secondary containment for spilled hazardous materials.

Process wastewater and cooling water pipes, plant drains and similar installations which drain into sewers, storm drains, public wastewater treatment plants, watercourses or other routes which drain to waters of the state shall be engineered so that spills of hazardous materials will not escape through them to waters of the State. If hazardous materials captured in secondary containment systems drain into process wastewater lines, provisions must be made to treat or remove the hazardous materials before the water is discharged.

On January 7, 1992, you or one of your employees disconnected a hose line leading into a recovery truck. The hose line was rerouted, enabling liquid to flow onto unprotected ground and into the Passaic River.

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Section 10.1b It shall be unlawful to use or operate any bulk storage area or part thereof without:

(b) providing for the segregation of potentially reactive chemicals which materials or which may react so as to form hazardous materials, and which present or cause a hazardous or dangerous condition.

It was noted that oxidizers, (M & T Chromic Acid) are stacked on top of corrosives: (Ethylene Chlorhydrin)

Section 12.2 All loading, unloading or transfer of hazardous materials shall take place by a qualified person.

All vehicles and rail cars carrying hazardous materials shall stand or be parked only in a secure area where they are under the care, custody, and control of a Permit holder.

A person who loads or unloads hazardous materials shall comply with the applicable Federal laws and regulations, in addition to any local and state requirements.

An unqualified person disconnected the hose leading to the waste container. If the person was qualified he would have been required to know that the product he was discharging onto the ground was hazardous.

Section 15.1 In the event of fire, explosion, structural failure, leakage or other discharge relating to hazardous materials requiring notifications under Federal or State law, the permit holder shall also notify the Director.

The permittee shall submit to the Director within ten days a copy of the written report pursuant to the Hazardous Substance Discharges: - Reports and Notices Act, N.J.S.A. 13:1K-15, and regulations promulgated thereunder.

The permittee shall also provide information to the Director relating to the ability of the permittee to contain and dispose of the hazardous material, the estimated time it will take to complete storage and disposal, the degree of hazard created and the quantity and type of material released. The Director may verify that the hazardous material is being contained and appropriately disposed.

The appropriate agencies were not notified when the spill, leak or discharge occurred. Private citizen reported this incident to the State Police.

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Section 17.1c Failure to abate, correct or rectify any noncompliance with the provisions of these Regulations any permit conditions or any provisions of the Hazardous Materials Management Plan with the time specified in the Notice of Noncompliance;

Section 17.3 If the cause of the noncompliance is not abated, corrected, or rectified within the time specified in the Notice of Noncompliance, a Notice of Violation shall be issued.

The Notice of Violation shall be in writing and shall include a reference to the original Notice of Noncompliance, the unconditional right to a hearing and the remedial action to be undertaken.

Under conditions of imminent hazard the Director may issue a Notice of Violation without issuing a Notice of Noncompliance.

Section 17.4 A request for a hearing by the permittee shall be given to the Director in writing, setting forth in particular any defense the permittee might have in regard to the alleged violations, and a brief statement of the factual matters in support thereof. The notice of the hearing date shall be given by the Director at least ten (10) days prior to the hearing date.

Section 18.4 Every Permit holder shall insure that a qualified person shall be in charge at all times and at each and every place where hazardous materials operations are carried out. The qualified person shall remain on the premises as long as the manufacture, use processing, or handling of hazardous materials is being carried out and shall return to the premises when required under emergency circumstances. To be a qualified person, the individual shall be knowledgeable in the chemical and physical processes utilized by the Permit holder.

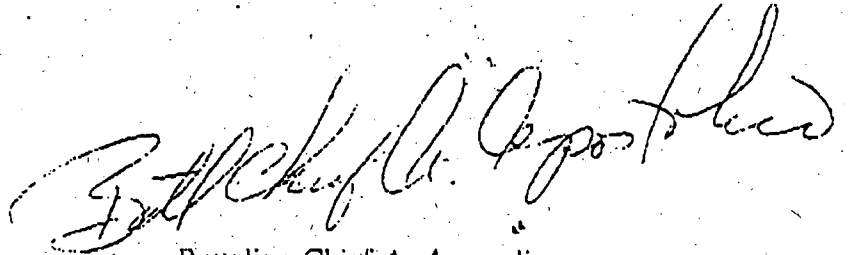
The Permit holder shall furnish to the Director a list of qualified persons with their addresses and telephone numbers to be contacted in the event of any emergency circumstance, to be updated annually. The director shall provide said personnel with passes to be shown to City emergency personnel to allow the holder to pass through any manned emergency barricades and enter the permittee facility in the event of an emergency.

The person who placed the hose leading from the building to the ground and into the river did not remain on the premises.

866300110

Section 20.2 Whenever in these Regulations any act is prohibited or is made or declared to be unlawful, or whenever in these Regulations the performance of any act is required or the failure to perform any act is made or declared to be unlawful, the commission of any such prohibited act or the failure to perform any such act, shall be punished by a fine or not more than \$1,000.00 per day per violation or by imprisonment for a term of not more than 90 days, or by any combination of such fine and imprisonment. Each day any violation of these Regulations continues shall be considered a separate offense.

You have been found to be in violation of five sections of the City of Newark's Hazardous Materials Regulations.

A handwritten signature in dark ink, appearing to read "Battalion Chief A. Apostolico". The signature is fluid and cursive, with the last name "Apostolico" being particularly prominent.

Battalion Chief A. Apostolico

AA:lm

866300111

NEWARK FIRE DEPARTMENT

**Office of Hazardous Materials
188 Mulberry Street
Newark, NJ 07102**

**Stanley J. Kossup
Director/Fire Chief**

(201) 733-7506

Fax (201) 733-7468

Chemical Compounds, Inc.
29 Riverside Avenue
Newark, NJ 07104

January 31, 1992

attn: Mr. Harold Sullivan

On January 31, 1992, a reinspection was conducted at your facility on 29 Riverside Avenue. The purpose of this was to check on the violations issued on January 10, 1992. The conclusions of this reinspection are as follows:

Section 8.4 Drainage from production facilities, including buildings, and other process areas shall be so engineered as to provide a means of secondary containment for spilled hazardous materials. Process wastewater and cooling water pipes, plant drains and similar installations which drain into sewers, storm drains, public wastewater treatment plants, watercourses or other routes which drain to waters of the state shall be engineered so that spills of hazardous materials will not escape through them to waters of the State. If hazardous materials captured in secondary containment systems drain into process wastewater lines, provisions must be made to treat or remove the hazardous materials before the water is discharged.

THIS VIOLATION HAS BEEN ABATED.

All internal drains in the building from the first floor have been re-piped, enabling them to drain into a 1,000 gallon tank located on the ground floor. After the material has been PH tested, it is pumped into a hazardous waste trailer.

Section 10.1b providing for the segregation of potentially reactive chemicals which are hazardous materials or which may react so as to form hazardous materials, and which reaction may present or cause a hazardous or dangerous condition.

THIS VIOLATION HAS BEEN ABATED.

The oxidizers, M & T chromic acid, have been relocated to a different location and are no longer stacked on top of corrosives, ethylene chlorhydrin.

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Section 12.2 All loading, unloading or transfer of hazardous materials shall take place by a qualified person.

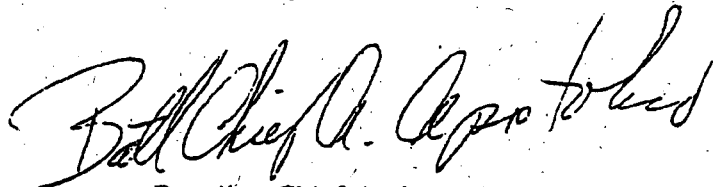
All vehicles and rail cars carrying hazardous materials shall stand or be parked only in a secure area where they are under the care, custody, and control of a Permit holder.

A person who loads or unloads hazardous materials shall comply with the applicable Federal laws and regulations, in addition to any local and state requirements.

THIS VIOLATION HAS BEEN ABATED.

Mr. Sullivan explained that his employees have been trained on the unloading and transfer of hazardous materials. Mr. Sullivan also stated that in the event of a leak, spill or accident his employees will know what to do. I instructed Mr. Sullivan to send me a letter documenting this, to which he agreed:

Mr. Sullivan was also informed that flammable liquids with a flammable rating of three or more should be stacked no more than two drums high, as we found three drums stacked on top of each other in the front of the building during our reinspection.



Battalion Chief Anthony Apostolico

AA:lm

866300113

DEQ-116
4789

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF ENVIRONMENTAL QUALITY
BUREAU OF EMERGENCY RESPONSE

FIELD NOTICE OF VIOLATIONS

CASE NO. 92-01-07-1025 DATE 01/07/92
CASE NAME CHEMICAL COMPOUNDS INC. ILLEGAL DUMPING
INCIDENT LOCATION PASSAIC RIVER & RIVERSIDE AVE. NEAR
RESPONSIBLE PARTY ADDRESS CHEMICAL COMPOUNDS
29-75 Riverside Ave., Newark N.J. 07104
RESPONSIBLE PARTY REPRESENTATIVE AL CELLERI / HAROLD SULLIVAN

You are hereby NOTIFIED that during an investigation by DEP on the above date, the following violations of New Jersey Statute and/or Regulation were observed. This violation has been recorded as part of a permanent enforcement history file. In addition, this case is being forwarded to the appropriate Division with a recommendation that formal enforcement action be taken.

☒ NJSA 58:10-23.11 C E

SPILL COMPENSATION AND CONTROL ACT

☒ NJSA 23:5-28

POLLUTION AND OBSTRUCTION OF WATER

☐ NJAC 7:26

HAZARDOUS WASTE REGULATIONS

☐

☐

DESCRIPTION OF VIOLATION Discharge & non-identification of a discharge of a hazardous substance into the waters and onto the land of the State of N.J.
pointway to the contamination of the Spill Compensation and Control
Act of the State of N.J.

Within immediate days of receipt of this notice, you shall submit in writing, to the address and investigator indicated below, an account of the incident and corrective measures taken to attain compliance.

Investigator Matthew Sammons

Address DEP Emergency Response

COPIES: White File Yellow Investigation Blue Responsible Party

866300114



State of New Jersey
Department of Environmental Protection and Energy
Division of Responsible Party Site Remediation

Metro Regional Office
2 Babcock Place
West Orange, NJ 07052
Tel. # 609-669-3955
Fax. # 201-669-3993

Scott A. Weiner
Commissioner

Karl J. Delaney
Director

Chemical Compounds Inc.
29-75 Riverside Avenue
Newark, NJ 07104
Attn: Alberto Celleri

February 26, 1992

Dear Mr. Celleri,

The New Jersey Department of Environmental Protection and Energy is authorized, pursuant to the New Jersey Spill Compensation and Control Act, N.J.S.A. 58:10-23.11 et seq. to collect all costs associated with a discharge and incurred by the State in the removal of hazardous substances or mitigation of damages. Accordingly, oversight costs (salary, materials and indirect costs), in the amount of \$708.60 were incurred by the Department when the Bureau of Emergency Response responded to an illegal dumping of acetic acid/anhydride which resulted in contamination of the ground and the Passaic River on 1/7/92 in Newark, Essex County. DEPE case number 92-01-07-1025.

Payment of this amount will not relieve the company from potential liability for civil or administrative penalties, additional costs incurred by the Department, nor any other responsibility or obligation under the law, including responsibility for damages which may have been caused by the discharge. Your payment of this amount merely satisfies the Bureau's interest in recovering its actual costs of the above referenced response action.

You must submit a check to the Department payable to the "Treasurer, State of New Jersey" within 30 days after receipt of this notice. Please send your check and the white copy of attached form DEP-062A to:

New Jersey Department of Environmental
Protection & Energy
Bureau of Revenue
CN 417
Trenton, NJ 08625-0417

You may contact Walter Janicek of the Bureau of Emergency Response at 201-669-3955 if you have any questions or require further information.

Very truly yours,

Stanley Delikat
Stanley Delikat

*Transmitted
to State of N.J.
SF*

DEP-062A
10/91

New Jersey Department of Environmental Protection and Energy

☐ Check here if Revised Billing

ENFORCEMENT INVOICE

Document # _____
Date Rec'd _____
Amount _____

DIVISION B.P.S.R.

PROGRAM EMERGENCY RESPONSE

TYPE: ☐ Fine/Penalty ☒ Cost Recovery

FACILITY ID NO. _____

PROGRAM ID NO. 92-01-07-1025

Case/Company Name Chemical Compounds

Address 2975 Riverside Avenue

Newark, NJ 07104

Please identify appropriate category:

☐ County Authority ☐ Industrial
☐ Local ☐ Regional ☐ Commercial
☐ Private ☐ Local ☐ Other -

Specify

DATE ASSESSED	DESCRIPTION	AMOUNT
2/7/92	ADMINISTRATIVE COST RECOVERY	\$708.60
DATE DUE: <u>March 31, 1992</u>	AMOUNT DUE:	\$708.60

Make check payable to: Treasurer, State of New Jersey

Mail to: NJDEPE, Bureau of Revenue
CN 417, Trenton, N.J. 08625-0417

COPY DISTRIBUTION: White - Remittance Copy Yellow - Company Pink - Bureau of Revenue Goldenrod - Division

866300116

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION AND ENERGY
BUREAU OF EMERGENCY RESPONSE
ADMINISTRATIVE COST RECOVERY WORK SHEET

PROJECT ACTIVITY # TFF

Case Name: Chemical Compounds

CASE

I.D.NO. 92-01-07-1025-33

COST CALCULATION: \$708.60

RESPONDER	DATE	REGULAR RATE	HOURS	AMOUNT	OVERTIME RATE	HOURS	AMOUNT
M. Garamone	1/7/92	52.20	4.0	208.80	----	----	----
C. Gibbons	1/7/92	52.20	3.5	182.70	----	----	----
M. Garamone	1/9/92	52.20	2.0	104.40	----	----	(Report)
M. Garamone	1/8/92	52.20	1.0	52.20	----	----	----
M. Garamone	1/9/92	52.20	2.5	130.50	----	----	----
Total =				678.60			

Equipment:

4 Drager Air sampling tubes - (Acetic Acid) - 4 x 7.50 ea/ = \$30.00

866300117

1086

Subpoena Duces Tecum Superior Court of New Jersey

State of New Jersey)
County of Mercer) SS

Custodian of Records
Chemical Compound, Inc.
29-75 Riverside Avenue
Newark, NJ

TO: R.J. Hughes Justice Complex
You are hereby commanded to appear at 25 Market St., 4th floor
In the City of Trenton on Friday
January 24th at 11:30 AM
to give evidence before the State Grand Jury and you are ordered to appear without prepayment
of witness fee and bring with you the following records: _____
See Attached Schedule "A"

If you fail to appear and produce the said records, a warrant may be issued for your arrest
and you may be charged with contempt.

WITNESS, the Honorable Samuel D. Lenox, Jr., Judge of the Superior Court,
this 13th day of January, 1992.



Donald F. Phelan

Donald F. Phelan
Acting Clerk of the Superior Court

James W. Lassen, DAG
(609) 984-4470

Received this subpoena at Trenton on 1/13/92 and on 1/14/92
at 29-75 Riverside Ave Newark I served it on the within named Harold Sullivan
Dtd 1/17
by delivering a copy to him.

Date 1/14/92

Sam L. Lippert, 970
State Investigator
Signature and Title

866300118

Custodial of Records
Chemical Compound, Inc.
29-75 Riverside Avenue
Newark, NJ

SCHEDULE A

1. In answer to this subpoena, the records shall:
 - a. Be delivered in the same condition and order as they are kept in the ordinary course of business:
 - b. a complete inventory shall accompany the records as to exactly what records are contained in each carton or envelope; and
 - c. the records shall be delivered in a secured carton or envelope as to protect the records and keep them in proper order.
 - d. The term "document" shall mean any ORIGINAL WRITING (handwritten, typed or otherwise reproduced) formal or informal, in your possession, custody, or control, regardless of where located and includes, but is not limited to, contracts, agreements, communications, letters, telegrams, regulations, memoranda, surveys, studies, summaries, reports, manifests, brokerage agreements, bills of lading, test analysis results, notices, announcements, transcripts, field notes, weigh tickets, telephone memoranda, purchase orders, instructions, charges, manuals, brochures, photographs, schedules, price lists, messages, records, invoices, tape recordings, notes of interviews or communications, calendar entries, records of meetings, applications, newspaper and advertisements, video tapes, information retrieval systems, and any other method of electronic storage, and material prepared for circulation to any past or present division, affiliate, officer, director, employee or agent. In all cases where originals are not available "documents" also mean copies of original writings and non-identical copies thereof.

Without limitation of the term "control" as used in the preceding sentence, a document is deemed to be in your control if you have the right to secure the document or a copy thereof from another source or public or private entity having actual possession thereof.
2. All documents reflecting the procedures or instructions for operating the centrifuge located on the second floor of Chemical Compound, Inc., 29-75 Riverside Avenue, Building #17.

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3. All documents reflecting the procedures or instructions for the cleaning and draining of the centrifuge located on the second floor of Chemical Compound, Inc., 29-75 Riverside Avenue, Building #17.
4. All documents or records reflecting the Chemicals or other substances which were either mixed in, processed by, or used in the centrifuge (located on the second floor of Chemical Compound, Inc., 29-75 Riverside Avenue, Building #17) between December 1, 1991 and on or before January 7, 1992. Also included in this demand are documents reflecting the schedule that this unit is cleaned, including the date immediately prior to January 7, 1992.
5. All documents reflecting the disposal of waste for the period December 1, 1991 to January 8, 1992.
6. All documents pertaining to discharges from Chemical Compound, Inc. or any of it's facilities, into the Passaic Valley Sewerage Authority, including but not limited to analysis, correspondence and operating procedures.

866300120



State of New Jersey
DEPARTMENT OF LAW AND PUBLIC SAFETY
DIVISION OF CRIMINAL JUSTICE

CN 085

RICHARD J. HUGHES JUSTICE COMPLEX
TRENTON, NEW JERSEY 08625-0085
TELEPHONE: 609-984-8500

ROBERT T. WINTER
DIRECTOR

ROBERT J. DEL TUFO
ATTORNEY GENERAL

August 18, 1992

Jonathan H. Roth, Esq.
129 Washington Street
P.O. Box 1779
Hoboken, NJ 087030

Dear Mr. Roth:

Enclosed please find copies of the draft Waiver of Indictment and Trial by Jury and Accusation prepared in accordance with your July 13, 1992 letter. Advise me if you have any changes and I will then file them and obtain a date with the Court for the plea.

The terms of the plea, pursuant to our recent discussions, are that Chemical Compounds, Inc. plead guilty to a fourth degree water pollution violation, N.J.S.A. 58:10A-10f(3), as contained in the enclosed. The State will accept a fine of \$5,000 for the offense and Chemical Compounds, Inc. will provide a check in the amount of \$1,760.85 payable to the Office of the State Environmental Prosecutor to be used to purchase a one page advertisement in the Gloucester Times conveying a positive environmental message. The defendant will not be identified in the advertisement.

As soon as I determine from you that this is satisfactory, I will schedule a date with the Court.

Very truly yours,


James W. Glassen

JWG/dk
Enclosure

SUPERIOR COURT OF NEW JERSEY
COUNTY OF ESSEX
LAW DIVISION - CRIMINAL

STATE OF NEW JERSEY)

v.)

CHEMICAL COMPOUNDS, INC.)

WAIVER OF INDICTMENT AND
TRIAL BY JURY

CHEMICAL COMPOUNDS, INC., the above named defendant,
charged with unlawful discharge of a pollutant, contrary to
N.J.S.A. 58:10A-10f(3) and N.J.S.A. 58:10A-6a, being advised
through its agents of the nature of the charges against them
and of their right to indictment and trial by jury, hereby
waives prosecution by indictment and trial by jury and requests
to be tried by the Court.

Dated in Newark, New Jersey, this day of
, 1992.

Signed and delivered
in the presence of

CHEMICAL COMPOUNDS, INC.

By: _____

Reported By:

Approved and accepted on this
day of , 1992,
in the presence of the
defendants and in open court.

James W. Glassen
Deputy Attorney General

The Honorable
Judge of the Superior Court

866300122

SUPERIOR COURT OF NEW JERSEY
COUNTY OF ESSEX
LAW DIVISION - CRIMINAL

STATE OF NEW JERSEY)

ACCUSATION

v.)

CHEMICAL COMPOUNDS, INC.)

CHEMICAL COMPOUNDS, INC. having been charged under oath with violating the Water Pollution Control Act and having in writing waived indictment and trial by jury and having requested that the Defendant be tried by Accusation by the Court, and the request having been granted;

DEPUTY ATTORNEY GENERAL JAMES W. GLASSEN, for the State of New Jersey, alleges that

COUNT ONE

(Unlawful Discharge of a Pollutant - Fourth Degree)

CHEMICAL COMPOUNDS, INC.

on or about January 7, 1992, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did negligently discharge a pollutant into a municipal treatment works, namely the Passaic Valley Sewerage Commission sewer system in the area of 29-75 Riverside Avenue, Newark, without possessing a valid industrial pretreatment permit issued by the Passaic Valley Sewerage Commission, that is, CHEMICAL COMPOUNDS, INC. did negligently release, spill, leak, pump, pour, emit, empty or dump into the Passaic Valley Sewerage Commission sewer system, which leads to the Passaic

866300123

Valley Sewerage Commission sewage treatment works, which then flows into waters of the State, a pollutant, namely industrial wastes, without possessing an industrial pretreatment program permit issued to CHEMICAL COMPOUNDS, INC. by the Passaic Valley Sewerage Commission, contrary to the provisions of N.J.S.A. 58:10A-10f, N.J.S.A. 58:10A-6a, and N.J.S.A. 2C:2-7, and against the peace of this State, the government and dignity of the same.

ROBERT J. DEL TUFO
ATTORNEY GENERAL OF NEW JERSEY

By: _____
James W. Glassen
Deputy Attorney General

LAW OFFICES
JONATHAN H. ROTH
129 Washington Street
P.O. Box 1779
Hoboken, New Jersey 07030

JONATHAN H. ROTH
Admitted in NJ, NY, MA

(201) 792-0870
Fax: (201) 659-1088

Of Counsel
MARISA Y. PARADISO
Admitted in NJ, NY, CO

August 28, 1992

Mr. Harold E. Sullivan, President
Chemical Compounds, Inc.
29-75 Riverside Avenue
Newark, New Jersey 07104

Mr. Alberto Celleri
Chemical Compounds, Inc.
29-75 Riverside Avenue
Newark, New Jersey 07102

Damon R. Sedita, Esq.
Schwartz, Tobia & Stanziiale
22 Crestmont Road
Montclair, New Jersey 07042

**RE: State of New Jersey v. Chemical Compounds, Inc./Draft
Waiver of Indictment and Trial by Jury and
Accusation**

Gentlemen:

I enclose herewith correspondence from James W. Glassen, D.A.G. in addition to Draft Waiver of Indictment and Trial by Jury and Accusation. Kindly review the same and provide me with the benefit of your comments and/or questions as soon as possible. The terms of the plea are set forth in Mr. Glassen's letter and are as follows:

1. Chemical Compounds, Inc. will plead guilty to a 4th Degree water pollution violation under N.J.S.A. 58:10A-10f(3) as contained in the enclosed;
2. Chemical Compounds, Inc. will pay a \$5,000 fine and \$1,760.85 for an environmental advertisement in the Gloucester Times.

866300125

THE LAW OFFICES OF JONATHAN H. ROTH

Mr. Harold E. Sullivan, President

Mr. Alberto Celleri

Damon R. Sedita, Esq.

August 28, 1992

Page 2

I look forward to hearing from you.

Very truly yours,



Jonathan H. Roth

JHR:slk
Encs.

866300126

CHEMICAL COMPOUNDS, INC.
2976 RIVERSIDE AVENUE
NEWARK, NJ 07104

6235

September 9 19 92

55-2/212
130

PAY
TO THE
ORDER OF

Treasury State of NJ

\$ 5,000.00

Five thousand and 00/00 DOLLARS



First Fidelity Bank, N.A. New Jersey
Executive Office
550 Broad Street
Newark, N.J. 07102 130

[Signature]

FOR

⑈006235⑈ ⑆021200025⑆ 113 117266 1⑈

CHEMICAL COMPOUNDS, INC.
2976 RIVERSIDE AVENUE
NEWARK, NJ 07104

6236

September 9 19 92

55-2/212
130

PAY
TO THE
ORDER OF

Environmental Protection

\$ 1,760.85

One thousand seven hundred sixty and 85/00 DOLLARS



First Fidelity Bank, N.A. New Jersey
Executive Office
550 Broad Street
Newark, N.J. 07102 130

[Signature]

FOR

⑈006236⑈ ⑆021200025⑆ 113 117266 1⑈

866300127

DEPARTMENT OF LAW AND PUBLIC SAFETY
DIVISION OF STATE POLICE

MP 71647

☒ Municipal Court of _____
☐ Superior Court, Special Part
of ESSEX County, New Jersey

Docket # _____ Receipt # _____ Amt. \$ _____
State of New Jersey

SUMMONS

County of ESSEX
YOU ARE HEREBY SUMMONED TO APPEAR PERSONALLY BEFORE THIS COURT AT THE TIME AND PLACE SPECIFIED BELOW TO ANSWER THE FOLLOWING VIOLATION(S):

On	Date	Mo	Yr	Day	Hour	AM	PM	
	7	7	1982	AM	10	45		
Name	CLIFFORD CARPONDAS INC							
Address	2975 RIVERSIDE AVE							
City	NEWARK						State	Zip
	NJ						07102	
Telephone No.	Home				Business			
	201-485-3211							
Operators Lic. No.							State	Exp. Date
Birth Date	Date	Mo	Yr	Eyes	Sex	Weight	Height	

DID UNLAWFULLY VIOLATE THE PROVISIONS OF

N.J.S. 23:5-28 N.J.A.C. _____

By committing the following violation(s) DID DRAIN CHURCH CARPONDAS AUTO SECOND FLOOR DRAIN

At or Upon PAISLEY RIVER

In the Municipality of NEWARK County of ESSEX

Doc. #	Reg. #	Exp. Date
Name	Make	
Home	City	State
Port	Length	
Propulsion	Type	Color

YOU ARE NOTIFIED THAT THE UNDERSIGNED WILL FILE A COMPLAINT IN THIS COURT CHARGING YOU WITH THE VIOLATION(S) SET FORTH ABOVE.

1/7/82 Date MPD Ben Benick Signature of Complainant 914 Badge No.

Identification F010-Newark Bay

NOTICE: IF YOU INTEND TO PLEAD NOT GUILTY AND TO CONTEST THE CHARGE SPECIFIED IN THIS SUMMONS, AT LEAST 3 DAYS PRIOR TO THE DATE FIXED FOR YOUR APPEARANCE IN COURT, YOU MUST NOTIFY THE CLERK, WHOSE ADDRESS AND TELEPHONE NUMBER IS SHOWN ON THE SUMMONS, OF YOUR INTENTION. IF YOU FAIL TO SO NOTIFY THE CLERK IT MAY BE NECESSARY FOR YOU TO MAKE TWO COURT APPEARANCES.

Court Appearance Required ☐ YOU WILL BE NOTIFIED

Court Appearance _____ day of _____ 19 _____ at _____ M.

Address of Court _____

Court Telephone _____

201-773-6520

SUMMONS

(Form approved May 25, 1982, pursuant to Rules 1:32-3, 4:70-3(a) & 7:3-1(b).)

866300128



State of New Jersey
Department of Environmental Protection and Energy
Division of Responsible Party Site Remediation

CN 028
Trenton, NJ 08625-0028

Jeanne M. Fox
Acting Commissioner

Karl J. Delaney
Director

November 30, 1993

Chemical Compounds Inc.
29-75 Riverside Avenue
Newark, NJ 07102

Attn: Alberto Celleri

Dear Mr. Celleri,

The New Jersey Department of Environmental Protection and Energy is authorized, pursuant to the New Jersey Spill Compensation and Control Act, N.J.S.A. 58:10-23.11 et seq. to collect all costs associated with a discharge and incurred by the State in the removal of hazardous substances or mitigation of damages. Accordingly, oversight costs (salary, materials and indirect costs), in the amount of \$866.47 were incurred by the Department when the Bureau of Emergency Response responded to a chemical fire at Chemical Compounds Inc. on 10/5/93 in Newark, Essex County. DEPE case # 93-10-05-0736 & 93-10-05-1110.

Payment of this amount will not relieve the company from potential liability for civil or administrative penalties, additional costs incurred by the Department, nor any other responsibility or obligation under the law, including responsibility for damages which may have been caused by the discharge. Your payment of this amount merely satisfies the Bureau's interest in recovering its actual costs of the above referenced response action.

You must submit a check to the Department payable to the "Treasurer, State of New Jersey" within 30 days after receipt of this notice. Please send your check and the white copy of attached form DEP-062A to:

New Jersey Department of Environmental
Protection & Energy
Bureau of Revenue
CN 417
Trenton, NJ 08625-0417

You may contact Walter Janicek of the Bureau of Emergency Response at 201-669-3955 if you have any questions or require further information.

Sincerely,


Stanley Delikat, Chief
Bureau of Emergency Response

866300129

DEPE-062A

New Jersey Department of Environmental Protection and Energy

Document # _____

10-11

☐ Check here if Revised Billing**ENFORCEMENT INVOICE**

Date Rec'd _____

Amount _____

DIVISION R-P-S-R-

FACILITY ID NO. _____

PROGRAM EMERGENCY RESPONSETYPE: ☐ Fine/Penalty ☒ Cost RecoveryPROGRAM ID NO. 93-10-05-1110Case/Company Name Chemical Compounds Inc.

Please identify appropriate category:

Address 29-75 Riverside Avenue
Newark, NJ 07102☐ County

Authority:

☐ Industrial☐ Local☐ Regional☒ Commercial☒ Private☐ Local☐ Other -

Specify

DATE ASSESSED	DESCRIPTION	AMOUNT
11/12/93	ADMINISTRATIVE COST RECOVERY	\$866.47
DATE DUE:	DECEMBER 30, 1993	AMOUNT DUE: \$866.47

Make check payable to: Treasurer, State of New Jersey

Mail to: NJDEPE, Bureau of Revenue

CN 417, Trenton, N.J. 08625-0417

COPY DISTRIBUTION: White - Remittance Copy Yellow - Company Pink - Bureau of Revenue Goldenrod - Division

866300130

12-3-93 - 11:30

Sent to Jonathan Roth

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION AND ENERGY
BUREAU OF EMERGENCY RESPONSE
ADMINISTRATIVE COST RECOVERY WORK SHEET

PAC # V35R

CASE NAME: Chemical Compounds CASE # 93-10-05-0736
93-10-05-1110

COST CALCULATION: \$866.47

RESPONDER	DATE	REGULAR RATE	HOURS	AMOUNT	O.T. RATE	HOURS	AMOUNT
B. Doyle	10/5/93	64.43	3.0	193.29	104.03	0.5	52.01
J. Hoyle	10/5/93	60.66	3.0	181.98	97.95	0.5	48.97

Reg. Total = 375.27

O.T. Total = 100.98

REPORT:

B. Doyle 10/5/93 64.43 4.0 257.72

Report Total = 257.72

EQUIPMENT:

Item:	Amount
HazCat	75.00
OVA	50.00
Drager Tubes	7.50

Equipment Total = 132.50

TOTAL AMOUNT DUE = \$866.47

866300131

New Jersey Department of Environmental Protection and Energy
Division of Facility Wide Enforcement
Metro Bureau of Water & Hazardous Waste Enforcement
2 Babcock Place, West Orange, N.J. 07052
(201) 669-3900



NOTICE OF VIOLATION

ID NO. ND 108661737

DATE SEP. 14. 94

NAME OF FACILITY CHEMICAL COMPOUNDS, Inc

LOCATION OF FACILITY 29-75 RIVERSIDE AV. NEWARK, N.J. 07104

NAME OF OPERATOR ALBERTO CELLERI - PRESIDENT

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following alleged violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded as part of the permanent enforcement history of your facility.

- DESCRIPTION OF VIOLATION N.J.A.C. 7:26-9.3(a)3 - no
accumulation sheet date on containers
9.7(c) - failing to describe the response actions
9.7(e) - failing to describe arrangements with
local authorities
9.7(f) - no home addresses of emergency coordinators
9.4(a)(i) - no job title for each position
9.4(a)(ii) - no written job description
9.4(b)8 - no emergency drills conducted.

Remedial action to correct these violations must be initiated immediately and be completed by

OCT. 14. 94

Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of up to \$50,000 per violation.

Facility Receipt of Copy Only

Investigator, Division of Facility Wide Enforcement
Department of Environmental Protection & Energy

866300132

New Jersey Department of Environmental Protection and Energy
Division of Facility Wide Enforcement
Metro Bureau of Water & Hazardous Waste Enforcement
2 Babcock Place, West Orange, N.J. 07052
(201) 669-3900



NOTICE OF VIOLATION

ID NO. NJ 108661-737 DATE SEP 14 94
NAME OF FACILITY CHEMICAL COMPOUNDS, Inc
LOCATION OF FACILITY 29-75 RIVERSIDE AV. NEWARK, NJ 07104
NAME OF OPERATOR ALBERTO CELLERI - PRESIDENT

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following alleged violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded as part of the permanent enforcement history of your facility.

DESCRIPTION OF VIOLATION N.J.A.C. 7:26-9.6(f) 1 - failing to
familiarize local authorities
9.6(f) 3 - no agreements with emergency contractor
9.6(f) 4 - failing to familiarize local authorities
9.6(f) 5 - no fire inspections

Remedial action to correct these violations must be initiated immediately and be completed by

OCT 14 94 Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of up to \$50,000 per violation.

Facility Receipt of Copy Only

Investigator, Division of Facility Wide Enforcement
Department of Environmental Protection & Energy

866300133

State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

866300135

in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-

**INFORM HAZARDOUS
WASTE MANIFEST**

1. Generator's US EPA ID No.

Manifest
Document No.

2. Page 1
of 1

Information in the shaded areas
is not required by Federal
law.

Generator's Name and Mailing Address

CHEMICAL COMPOUNDS - 2975 RIVERSIDE AVE
BLDG. 17 - NEWARK, NJ 07104

4. Generator's Phone ()

(201) 495-3212

5. Transporter 1 Company Name

FREEHOLD CARTRIDGE INC.

6. US EPA ID Number

NJ000541461017

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address

ECOFIS - 3750 PATENTON ST.
GREENSBORO, NC 27407

10. US EPA ID Number

NJ000700113137

A. State Manifest Document Number

NJA 0765131

B. State Generator's ID

C. State Trans. ID

D. Transporter's Phone ()

E. State Trans. ID

F. Transporter's Phone ()

G. State Facility's ID

H. Facility's Phone ()

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

a. 24 METAL FLAMMABLE LIQUID UN1220 (F003)

12. Containers
No. Type

13. Total
Quantity

14. Unit
Wt/Vol

15. Waste No.

XXI TITANIC E F003

J. Additional Descriptions for Materials Listed Above

a. HA - METAL FLAMMABLE LIQUID F003
b. HA - WATER 20%

K. Handling Codes for Wastes Listed Above

a. b. c. d.

15. Special Handling instructions and Additional Information

A- 12 ECC-009 J02 = C-0008 120F-001

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Signature

Month Day Year

17. Transporter 1 Acknowledgement or Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

(A) 1101-0013 - ACTUALLY RECEIVED 2/17/90
GENERATOR DID NOT DATE

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name

Signature

Month Day Year



CN 028, Trenton, NJ 08625

Form Approved OMB No. 2050-0039 Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.		2. Page 1 of 1		3. Information not required by Federal law	
3. Generator's Name and Mailing Address Chemical Compounds Inc. 29-75 Highway 412 Newark, NJ 07104				4. State Manifest Document Number NJA-0589094			
4. Generator's Phone (201) 985-3212		5. US EPA ID Number		6. State Generator's ID		7. State Facility's ID	
5. Transporter 1 Company Name Chemical Waste Management Inc.		6. US EPA ID Number		7. State Generator's ID		8. State Facility's ID	
6. Transporter 2 Company Name		7. US EPA ID Number		8. State Generator's ID		9. State Facility's ID	
8. Designated Facility Name and Site Address Chemical Waste Management of New Jersey Inc. 100 Lister Ave Newark, NJ 07105				9. US EPA ID Number			
10. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM				11. Containers		12. Total Quantity	
				No. Type		Unit	
a. Non-Hazardous Dye Wash Water - Not regulated by HPCR				1		1	
b.							
c.							
d.							
13. Additional Descriptions for Materials Listed Above				14. Handling Codes for Wastes Listed Above			
a. Not regulated by HPCR				b. Not regulated by HPCR			
c.				d.			
15. Special Handling Instructions and Additional Information CW# K32525 Wt# 26645 Inc. by 00003				16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.			
17. Transporter 1 Acknowledgement of Receipt of Materials				18. Transporter 2 Acknowledgement of Receipt of Materials			
Printed/Typed Name Harold E. Sullivan				Signature Harold E. Sullivan			
Printed/Typed Name Harold E. Sullivan				Signature Harold E. Sullivan			
19. Discrepancy Indication Space Section 1 and 15 are missing number 1 and 15 00003				20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.			
Printed/Typed Name Harold E. Sullivan				Signature Harold E. Sullivan			

EPA Form 600-22 (Rev. 9/80) Previous editions are obsolete.

4 - TSD FACILITY COPY

SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES

866300136



State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

Please type or print in block letters. (Form designed for use on eight (12-pitch) typewriter.)

Form Approved. CMB No. 2080-0032. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address CHEMICAL COMPOUNDS INC. 29-75 RIVERSIDE AVE NEWARK N.J. 07102		4. Generator's Phone (201) 485-3213		A. State Manifest Document Number NJA-8889052	
5. Transporter 1 Company Name CHEMICAL WASTE MANAGEMENT INC		6. Transporter 1 US EPA ID Number 1711713712121		B. State Transporter ID 1711713712121	
7. Transporter 2 Company Name CHEMICAL WASTE MANAGEMENT OF NEW JERSEY INC.		8. Transporter 2 US EPA ID Number 1711713712121		C. State Transporter ID 1711713712121	
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT OF NEW JERSEY INC. 100 LISTER AVENUE SUITE 500 NEWARK NJ 07102		10. Facility US EPA ID Number 1711713712121		D. Facility State ID 1711713712121	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) NOT HAZARDOUS FOR U.S. DOT DYE WHITE PASTE		12. Containers No. Type		13. Total Quantity	14. Unit Wt/Vol
a. NOT HAZARDOUS FOR U.S. DOT		b. 71-11 71050019		c. 5121212	d. 5121212
15. Special Handling Instructions and Additional Information WQ # A 28314 100 LISTER AVE SUITE 500		K. Handling Codes for Wastes Listed Above SD/101			
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name HAROLD E. SULLIVAN		Signature <i>[Signature]</i>		Month Day Year 1-15-1991	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Robert T. Bost		Signature <i>[Signature]</i>		Month Day Year 01-15-91	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Robert T. Bost		Signature <i>[Signature]</i>		Month Day Year 01-15-91	
19. Discrepancy Indication Space # 13 Newark NJ 07102					
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name Robert T. Bost		Signature <i>[Signature]</i>		Month Day Year 01-15-91	

EPA Form 3700-22 (Rev. 9-89) Previous editions are obsolete.

4 - TSO FACILITY COPY

SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES

866300137

In and the N.J. Dept. of Environmental Protection, (609) 651-4500 (Day) (609) 292-7172 (Night)

In case of an emergency or spill immediately call the state the emergency no.



State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

Please type or print in block letters. (Form designed for use on 11x17 (12-pitch) typewriter.)

Form Approved OMB No. 2050-0038 Expires 8-31-97

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address CHEMICAL COMPOUNDS INC 29-75th Avenue A.D. NEWARK NJ 07104		4. Generator's Phone (303) 495-3212		5. State Manifest Document Number NJA 0880028	
6. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT NJ INC 100 Lister Ave. NEWARK N.J. 07105		7. Transporter 1 Company Name CHEMICAL WASTE MANAGEMENT		8. State Trans. ID ST 712512	
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT NJ INC 100 Lister Ave. NEWARK N.J. 07105		10. Transporter 2 Company Name		11. Facility's Phone (201) 665-7100	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM		12. Containers No. Type		13. Total Quantity Unit Wt/Vol	
a. NON HAZARDOUS DYE WASH WATER NOT REGULATED BY 49 CFR		11		11	
b.					
c.					
d.					
14. Additional Descriptions for Materials Listed Above ACETIC ACID ACETIC ACID ACETIC ACID		15. Handling Codes for Wastes Listed Above Subst			
16. Special Handling Instructions and Additional Information WATER Decal 60731 CHEMICAL WASTE MANAGEMENT W/D # A-28231					
17. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name HAROLD E. Sullivan		Signature <i>Harold E. Sullivan</i>		Month Day Year 12/1/91	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Herbert Downes		Signature <i>Herbert Downes</i>		Month Day Year 12/6/91	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space #13 amended to 5245 about 60 gal. left in tank					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name JOHN C. 102-2		Signature <i>John C. 102-2</i>		Month Day Year 12/1/91	



State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

Please type or print in block letters. (Forms designed for use on 11x17 (12-pitch) typewriter.)

Form Approved. OMB No. 2060-0038. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address <i>Chemical Compounds</i> <i>29-75 Hightower Avenue Bldg 17</i> <i>Newark, NJ 07102</i>		4. US EPA ID Number <i>ACTD01081611737</i>		5. State Manifest Document Number <i>NJ A 223360</i>	
6. Transporter 1 Company Name <i>Chemical Waste Management Inc</i>		7. US EPA ID Number <i>101009920161</i>		8. State Manifest Document Number <i>NJ A 223360</i>	
9. Designated Facility Name and Site Address <i>Chemical Waste Management of New Jersey, Inc</i> <i>100 Lister Avenue</i> <i>Newark, NJ 07102</i>		10. US EPA ID Number <i>101009920161</i>		11. State Manifest Document Number <i>NJ A 223360</i>	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity	
a. <i>Non-Hazardous Dye wastes in line</i> <i>Not Regulated by HPCR</i>		No. Type		Unit	
b. <i>Non-Hazardous Dye wastes in line</i> <i>Not Regulated by HPCR</i>		No. Type		Unit	
c. <i>Non-Hazardous Dye wastes in line</i> <i>Not Regulated by HPCR</i>		No. Type		Unit	
d. <i>Non-Hazardous Dye wastes in line</i> <i>Not Regulated by HPCR</i>		No. Type		Unit	
e. <i>Non-Hazardous Dye wastes in line</i> <i>Not Regulated by HPCR</i>		No. Type		Unit	
14. Additional Descriptions for Materials Listed Above		15. Handling Codes for Wastes Listed Above		16. Special Handling Instructions and Additional Information	
a. <i>Non-Hazardous Dye wastes in line</i> <i>Not Regulated by HPCR</i>		b. <i>Non-Hazardous Dye wastes in line</i> <i>Not Regulated by HPCR</i>		c. <i>Non-Hazardous Dye wastes in line</i> <i>Not Regulated by HPCR</i>	
17. Generator's Certification		18. Transporter 1 Acknowledgement of Receipt of Materials		19. Discrepancy Indication Space	
I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.		Printed/Typed Name <i>Herbert D. Dorey</i>		Signature <i>Herbert D. Dorey</i>	
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.		Printed/Typed Name <i>Herbert D. Dorey</i>		Signature <i>Herbert D. Dorey</i>	
18. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.		Printed/Typed Name <i>Herbert D. Dorey</i>		Signature <i>Herbert D. Dorey</i>	
19. Discrepancy Indication Space		Printed/Typed Name <i>Herbert D. Dorey</i>		Signature <i>Herbert D. Dorey</i>	
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.		Printed/Typed Name <i>Herbert D. Dorey</i>		Signature <i>Herbert D. Dorey</i>	

TOTAL P.06

866300139



State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

Please type or print in block letters. (Form designed for use on site (12-pitch) typewriter.)

Form Approved, GMS No. 2050-0038, Expires 9-30-97

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address General Composites Inc 25 Riverside Ave Newark, NJ 07104		1. Generator's US EPA ID No. MTD1086617371		2. Page 1	Information in the shaded areas is not required by Federal law.
4. Generator's Phone (201) 985-3242		5. US EPA ID Number MTD1086617371		6. State Manifest Document Number NJA 0800000000	
7. Transporter 1 Company Name Chemical Waste Management Inc		8. US EPA ID Number ILD109921021681		7. State Transfer ID MTD1086617371	
9. Designated Facility Name and Site Address Chemical Waste Management Inc 100 Lister Avenue, Newark, NJ 07105		10. US EPA ID Number MTD1086617371		8. Transporter's Phone 908-277-7777	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM		12. Containers No. Type		13. Total Quantity	14. Unit Wt/Vol
a. NOT HAZARDOUS per US DOT Dye Waste Water		001 TT 950096		2.200	
b.					
c.					
d.					
15. Special Handling Instructions and Additional Information K32692 W/O # A26095-A-27398 NS Decal # 60706 In Case of Emergency Call 985-3242		16. Handling Codes for Wastes Listed Above 01/01			
17. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name HAROLD E. SULLIVAN		Signature <i>[Signature]</i>		Month Day Year 09/01/91	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name DAVID R. KAMM		Signature <i>[Signature]</i>		Month Day Year 09/01/91	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space #13 Unneeded to 4943					
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name USAC XOP-2					
Signature <i>[Signature]</i>		Month Day Year 09/01/91			

EPA Form 8700-22 (Rev. 8/88) Previous editions are obsolete.

4 - TRD EACH ITY COPY

SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES

866300140



State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

866300141

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-G039. Expires 9-30-

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded area is not required by Federal law.
3. Generator's Name and Mailing Address CHEMICAL COMPOUNDS INC 29-75 RIVERSIDE AVE NEWARK NJ 07102		1. Generator's US EPA ID No. NJID110181611787127312		A. State Manifest Document Number NJ 1228362	
4. Generator's Phone (201) 455-3212		5. Transporter 1 Company Name CHEMICAL WASTE MANAGEMENT		B. State Generator's ID	
5. Transporter 1 Company Name CHEMICAL WASTE MANAGEMENT		6. US EPA ID Number		C. State Trans. ID	
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone (201) 455-3212	
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT OF NJ 100 LISTER AVE 110 WILKINSON AVE NEWARK NJ 07102		10. US EPA ID Number		E. State Trans. ID	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM NOT HAZARDOUS PER US DOT DYE WATER		12. Containers No. Type		13. Total Quantity 5000 G X 900	
14. Additional Descriptions for Materials Listed Above IDA TRN 707 A. Additional Descriptions for Materials Listed Above A. Additional Descriptions for Materials Listed Above A. Additional Descriptions for Materials Listed Above		15. Special Handling Instructions and Additional Information NO FEA 33422 DE LAC 12856		K. Handling Codes for Wastes Listed Above	
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name H. H. F. S.		Signature H. H. F. S.		Month Day Year 10/13/1992	
7. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name TACK FORTY		Signature Tack Forty		Month Day Year 10/13/1992	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name Signature Month Day Year					

866300178

NOV 23 1981

DONALD LAN
SECRETARY OF STATE

CERTIFICATE OF INCORPORATION

of

CHEMICAL COMPOUNDS, INC.

THIS IS TO CERTIFY, that I, GEORGE L. GARRISON do hereby associate myself into a corporation under and by virtue of the provisions of an Act of the Legislature of the State of New Jersey entitled "An Act Concerning Corporations" (Revised Statutes of New Jersey, 1937, Title 14 and Title 14A) and the several supplements thereto and acts mandatory thereof and do hereby agree to take the number of shares of capital stock set opposite my name.

FIRST: The name of the corporation is:
CHEMICAL COMPOUNDS, INC.

SECOND: The location of the principal office in this State is at 1135 Clifton Avenue, Clifton, New Jersey 07011.

THIRD: The name of the agent therein and in charge thereof upon whom process against this corporation may be served is GEORGE L. GARRISON.

FOURTH: The purposes for which this corporation is formed are as follows: To engage in any activity within the purposes for which corporations may be organized under New Jersey Statutes Annotated, Title 14A, entitled "Corporations, General".

FIFTH: The name and post office addresses of

the incorporators and the number of shares subscribed for by them, the aggregate of such subscription being the total amount of capital stock with which this corporation will commence business, is as follows:

GEORGE L. GARRISON
1135 Clifton Avenue
Clifton, New Jersey 07013..... 100 shares

SIXTH: The period of existence of this corporation is unlimited.

SEVENTH: The total authorized capital stock of the corporation is two thousand five hundred (2500) shares of common stock without nominal or par value. All or any part of said shares of common stock, without nominal or par value, may be issued by the corporation from time to time and for such consideration as may be determined and fixed by the unanimous vote of the Board of Directors as provided by law.

EIGHTH: The number of Directors constituting the first Board of Directors shall be two and shall be:

George Moncayo 7 Berard Boulevard
Oakdale, Long Island, N.Y. 11769

Anna Maria Moncayo 7 Berard Boulevard
Oakdale, Long Island, N.Y. 11769

IN WITNESS WHEREOF, I have hereunto set my hand and seal this 16th day of November, 1981.

George L. Garrison

GEORGE L. GARRISON

L.S.

WITNESS:

James Penella

866300179

STATE OF NEW JERSEY)
COUNTY OF PASSAIC) ss.:

BE IT REMEMBERED, that on this 16th day of November, 1981, before me, a Notary Public of the State of New Jersey, personally appeared GEORGE L. GARRISON who, I am satisfied, is the person named in and who executed the foregoing Certificate, and I, having first made known to him the content thereof, he did acknowledge that he signed, sealed and deliver the same as his voluntary act and deed.

Jeanne A. DiNella

JEANNE A. DINELLA
A NOTARY PUBLIC OF NEW JERSEY
MY COMMISSION EXPIRES OCT. 9, 1985

866300180

BEFORE

McCARTER

(NEW JERSEY STATE HIGHWAY ROUTE 21)

HIGHWAY

RAILROAD

CHESTER

AVENUE EAST

N/F ERIE - LACKAWANNA

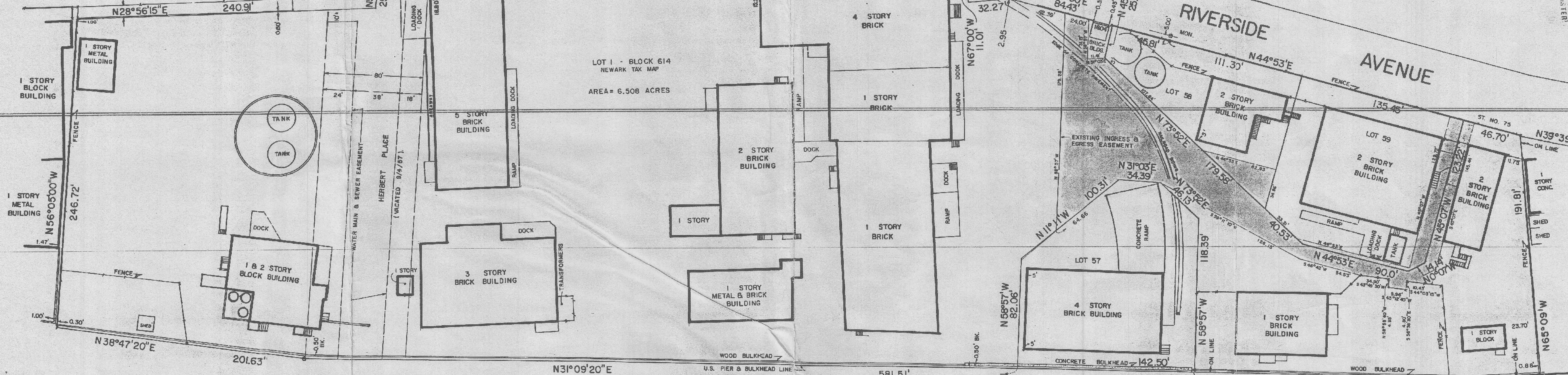
RAILROAD

RIVERSIDE

AVENUE

DEED

RECEIVED & RECORDED
ESSEX COUNTY
FEB 1 11 34 AM '95



AFTER

Mc CARTER

(NEW JERSEY STATE HIGHWAY ROUTE 21)

HIGHWAY

RAILROAD

CHESTER

AVENUE EAST

N/F ERIE - LACKAWANNA

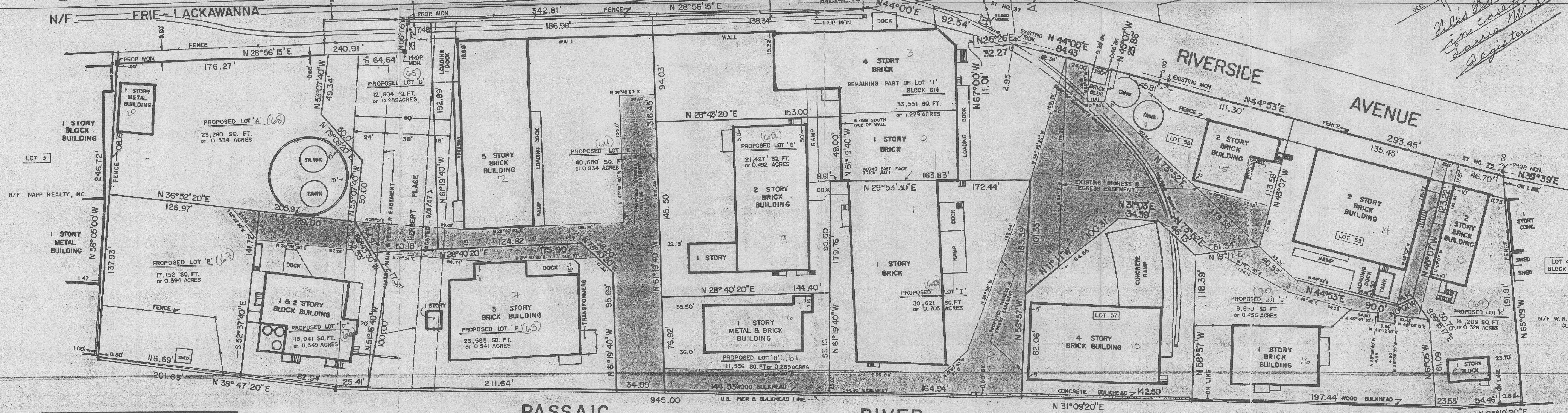
RAILROAD

RIVERSIDE

AVENUE

DEED

*2nd Albany 4/1985
in case # 3594
James M. Atalla
Register*



WE HEREBY CERTIFY THAT THIS MAP HAS BEEN APPROVED
BY THE CENTRAL PLANNING BOARD OF THE CITY OF
NEWARK ON NOVEMBER 5, 1994, AND SAID MAP
COMPLIES WITH THE PROVISIONS OF THE MAP FILING
LAW (N.J.S.A. 46:23-99, ET SEQ.)

THIS CERTIFICATION SHALL EXPIRE IF THIS MAP IS NOT
IN THE OFFICE OF THE REGISTER OF DEEDS/COUNTY ON
OR BEFORE THE 31st DAY OF DECEMBER 1995
DATE DEC 21, 1994
SECRETARY, CENTRAL PLANNING BOARD

I CERTIFY THAT A BOND HAS BEEN GIVEN TO THE
MUNICIPALITY GUARANTEEING FUTURE SETTING OF THE
MONUMENTS SHOWN ON THIS MAP AND SO DESIGNATED
DATE DEC 21, 1994
CITY CLERK

I THE UNDERSIGNED, HAVING AN INTEREST IN THE
TITLE OF THE PROPERTY COVERED BY THIS SUB-
DIVISION MAP DO HEREBY CONSENT TO THE FILING
OF THIS MAP IN THE OFFICE OF THE ESSEX COUNTY CLERK.
BY Anthony V. Pagano

I HAVE CAREFULLY EXAMINED THIS MAP AND FIND IT
CONFORMS WITH THE PROVISIONS OF THE MAP FILING
LAW AND THE MUNICIPAL ORDINANCE AND REQUIREMENTS
APPLICABLE THERE TO.
DATE 12/1/94
MUNICIPAL ENGINEER #1214

I HEREBY CERTIFY THAT THIS MAP AND SURVEY HAS
BEEN MADE UNDER MY SUPERVISION AND COMPLIES
WITH THE PROVISIONS OF THE MAP FILING LAW
LICENSED LAND SURVEYOR NO. 10868

PROPOSED SUBDIVISION

LOT 1 - BLOCK 614
NEWARK TAX MAP

OWNER: INDUSTRIAL DEVELOPMENT ASSOCIATES
254 MITCHELL STREET
ORANGE, N.J.

GRAPHIC SCALE
40 20 0 20 40
1" = 40'

BORRIS McDONALD R. WATSON

LAND SURVEYORS
972 MCCARTER HIGHWAY, NEWARK, N.J. 07102

ROBERT T. WATSON N.J.S. 10886

DATE JUNE 25, 1994 SCALE 1" = 40'